

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

DE-9J

April 4, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chad Erdmann
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Corrective Measures Implementation Workplan Keystone Steel & Wire Company EPA ID No. ILD 000 714 881

Dear Mr. Perry: ·

The United States Environmental Protection Agency (U.S. EPA) has completed the review of the March 2006 Revised Corrective Measures Implementation Work Plan (CMI WP) for the Keystone Steel and Wire (KS&W) facility in Peoria, Illinois. We have also reviewed the facility's March 8, 2006 letter presenting associated responses to EPA comments and detailing revisions made to the November 2005 version of the CMI WP. Items remaining to be addressed are outlined below. All other issues have been satisfactorily resolved. KS&W must revise the CMI workplan to address all of the comments in this attachment within 15 days of receipt of this letter and submit to U.S. EPA for review and approval.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954

Sincerely,

Jonathan Adenuga

Waste Pesticides and Toxics Division

Enclosure

US EDA RECORDS CENTER REGION S

1000726

ATTACHMENT

- 1. Comment 9: ENTACT has appropriately incorporated U.S. EPA's well installation and groundwater monitoring recommendations into Sections 3.2.9 and 3.3.8 of the CMI WP. Accordingly, the first sentence in each section should eliminate reference to these monitoring efforts as a "one-time" groundwater monitoring program.
- 2. Comments 10 and 25: Although ENTACT's response letter indicates that Section 4.1.2 of the CMI WP and appropriate sections of the Quality Assurance Project Plan (QAPP) have been updated to reflect U.S. EPA's comment, no such changes appear to have been made. ENTACT should ensure that content requirements for the quarterly progress reports are appropriately amended, as requested.
- 3. Comment 27: In their response, ENTACT has clarified that analytical data obtained during the investigation will not be formally validated. Instead, ENTACT indicates that they will conduct a cursory review of the primary QC elements. However there is no specific, specified corrective action for items that are out of control. Given that these data will be used to document successful achievement of corrective action objectives, we recommend that at least a representative portion of the data be formally validated in accordance with U.S. EPA's guidance. The CMI WP should be revised accordingly.
- 4. Comment 28: Tables 1 and 2 still need to be updated to reference SW-846 test method 8260B for volatile organic compound analyses.



Keystone Consolidated Industries, Inc.

7000 S.W. Adams Street Peoria, IL 61641 (309) 697-7702

David L. Cheek
President and Chief Executive Officer

February 27, 2006

CERTIFIED MAIL # 7004 2510 0002 6415 7367 RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Financial Assurance Demonstration

Keystone Steel & Wire Company EPA ID No: ILD 000 714 881

Dear Mr. Adenuga:

We would like to thank you and Mr. Hamper for discussing our corrective action financial assurance options with Keystone Steel & Wire Co. (Keystone) during the conference call on February 14, 2006. Moreover, we appreciate your understanding of our situation and your receptivity and support for what we believe to be a reasonable yet effective approach. Based upon the discussions during the conference call, the USEPA and Keystone agreed upon a solution to the financial assurance issue for the corrective action activities at the Peoria Plant.

As requested in your letter dated February 16, 2006, (received February 22) Keystone is submitting herewith the documentation from ENTACT Services for the corrective action activities completed at the North Ditch Staging Area as of February 14, 2006.

By April 21, 2006, Keystone will submit to you documentation for the completion of the remaining corrective action activities at the North Ditch Staging Area and F-Pond. Keystone will also provide a copy of all invoices for services paid to ENTACT.

Should you have any questions or need additional information please do not hesitate to call me at 309/697-7702.

Respectfully,

David L. Cheek

President and Chief Executive Officer

Attachment

cc: George Hamper, USEPA (less attachment)

Andrew Running, Kirkland & Ellis

Pierce Marshall, on behalf of Keystone Steel & Wire Co. Kevin Lombardozzi, on behalf of Keystone Steel & Wire Co. Bert Downing, Keystone Steel & Wire Co. (less attachment)

Chad Erdmann, Keystone Steel & Wire Co. Thad Slaughter, ENTACT (less attachment)

CERTIFICATION STATEMENT FOR CORRECTIVE MEASURES IMPLEMENTATION REPORT NO. 1 Keystone Steel & Wire Company Peoria, Illinois

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ILD000714881

U.S. EPA ID Number

2-27-06

Date

Signature of Owner/Operator

Responsible Officer

Keystone Steel & Wire Company

Facility Name

David L. Cheek, President & CEO

Name and Title of Owner/Officer

Responsible Officer

CORRECTIVE MEASURES STATUS REPORT NO. 1

for the

NORTH DITCH STAGING AREA AND F-POND RCRA CORRECTIVE MEASURES AS OF FEBRUARY 14, 2006

at the

7000 SW ADAMS STREET
PEORIA, ILLINOIS 61641

FEBRUARY 27, 2006

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1.0 INTRODUCTION

This Corrective Measures Implementation Report No. 1 has been prepared by ENTACT Services LLC (ENTACT) on behalf of the Keystone Steel and Wire Company (Keystone) for the RCRA corrective action activities associated with the F-Pond and North Ditch Staging Area at Keystone's facility located in Peoria, Illinois. This Corrective Measures Implementation Report No. 1 has been developed, at the request of the U.S. Environmental Protection Agency (EPA), to describe the work performed at the F-Pond and North Ditch Staging Area through February 14, 2006.

1.1 Background

The corrective measures activities associated with the Keystone facility are being performed pursuant to the Corrective Measures Implementation (CMI) Workplan dated November 4, 2005 and subsequent revisions. This CMI Workplan was developed to describe the operational components of the selected corrective measures for the F-Pond and North Ditch Staging Area, as described in the Statement of Basis dated October 14, 2005, in order to fulfill the requirements of the Administrative Order on Consent between the U.S. EPA and Keystone.

1.2 Corrective Measures Components

The selected corrective measures for the F-Pond and North Ditch Staging Area address lead and iron contamination, as appropriate, in the sediment/soil. The major components of the selected corrective measures include the following:

North Ditch Staging Area

- Identification of characteristically hazardous soils;
- In-situ treatment of characteristically hazardous soils, if present, to render the soils non-hazardous, when generated;
- Excavation of the treated and impacted soils to achieve the remediation goals;
- Off-site disposal of the excavated soils as non-hazardous waste at a Subtitle D disposal facility;
- Deed restriction on the North Ditch Staging Area to limit future use of the unit to commercial/industrial purposes; and
- Implementation of groundwater sampling to demonstrate no impact to the underlying groundwater.

F-Pond

- Dewatering of the F-Pond;
- Identification of characteristically hazardous soils/sediments;



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- In-situ treatment of characteristically hazardous soils/sediments, if present, to render the soils/sediments non-hazardous, when generated;
- Excavation of the treated and impacted soils/sediments to achieve the remediation goals;
- Off-site disposal of the excavated soils/sediments as non-hazardous waste at a Subtitle D disposal facility;
- Deed restriction on the F-Pond to limit future use of the unit to commercial/industrial purposes; and
- Implementation of groundwater sampling to demonstrate no impact to the underlying groundwater.

This report will summarize the above-mentioned activities performed by ENTACT through February 14, 2006 and will include any analytical data, a summary of excavation and disposal activities, and other supporting documentation required to verify such performance.



2.0 SUMMARY OF CORRECTIVE MEASURES IMPLEMENTATION THROUGH FEBRUARY 14, 2006

This Corrective Measures Implementation Report No. 1 has been developed at the U.S. EPA's request to describe the work performed at the North Ditch Staging Area and F-Pond through February 14, 2006. The following sections further describe the activities conducted by ENTACT during this timeframe.

2.1 North Ditch Staging Area

The corrective measures at the North Ditch Staging Area were implemented in November 2005 and continue through February 2006.

2.1.1 Identification of Characteristically Hazardous Soils

In November 2005, the limits of the North Ditch Staging Area, including the sampling locations from the December 2002 sampling event, were identified by a licensed surveyor based on the data provided in the *Final Corrective Measures Proposal* dated January 2003. A 50-ft by 50-ft coordinate grid system was established in the surveyed areas as described in the *CMI Workplan* dated November 4, 2005 and subsequent revisions.

Soil samples from the locations in the North Ditch Staging Area where samples were previously collected in December 2002 (see Figure 2 of the *Field Sampling Plan*, included as Appendix B to the *CMI Workplan*) were collected to determine if the soil exhibited the toxicity characteristic for lead (>5 mg/l TCLP). Grab samples were collected from each of the December 2002 sampling locations at depths of approximately 1 to 2 feet below ground surface and were submitted to PDC Laboratories, Inc. for analysis of lead using the toxicity characteristic leaching procedure (TCLP).

2.1.2 In-situ Treatment

Based on the sampling results, in February 2006, the soils in the North Ditch Staging Area were treated in-situ with approximately 2% granular triple superphosphate (TSP) to a depth of approximately 2 feet below ground surface (bgs). The treated soil was then sampled in place, in volumes of approximately 300 cubic yards, for characterization purposes. A 4-part composite sample was collected from each 300 cubic yard volume and was submitted to PDC Laboratories, Inc. for analysis of TCLP lead. The results of the characterization sampling are presented in Table 1 and the laboratory analytical reports are included in Attachment 1.

Soils were not removed from the treatment area until the analytical results confirmed that the soil no longer exhibited the toxicity characteristic for lead and thus, would not be considered hazardous waste when generated.



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2.1.3 Excavation

In February 2006, the in-situ treated soil was excavated using hydraulic excavators to a depth of approximately 2 feet below ground surface.

Post-excavation confirmation samples were then collected from the excavated surfaces of the grid to document that the soil which exhibited the toxicity characteristic for lead was treated and removed and that the remediation goal for the North Ditch Staging Area (800 mg/kg total lead) was achieved. One composite sample consisting of 4 parts was collected from the excavation bottom and sidewall of each grid, as depicted on Figure 1. The samples were then submitted to PDC Laboratories for analysis of total lead. Excavation bottom samples collected from grids B2, A3, A5, and A6, where soils initially exhibited the toxicity characteristic for lead, were also analyzed for TCLP lead.

The laboratory analytical results indicated that the post-excavation surface in most grids did not achieve the remediation goals for the North Ditch Staging Area. Therefore, in-situ treatment and excavation will continue until the remediation goals are achieved. This work has been initiated and will be reported in Corrective Measures Status Report No. 2.

The results of the interim post-excavation confirmation sampling are presented on Table 2 and the laboratory analytical reports are included in Attachment 1.

2.1.4 Load-out, Transportation and Off-site Disposal

In February 2006, upon the receipt of laboratory analytical results which indicated that the in-situ treated soil would be non-hazardous when generated, i.e. TCLP lead concentrations did not exceed 5 mg/l, the soils were excavated and direct loaded into tandem trucks for off-site transportation and disposal at the Tazwell RDF in East Peoria, Illinois. As of February 14, 2006, approximately 2,392.65 tons of soil from the North Ditch Staging Area was disposed as non-hazardous special waste at this facility. A summary of the waste disposal information is provided in Table 3. Additional soil will be sent off-site for disposal based on additional excavation required to meet the remediation goals.

2.2 F-Pond

No corrective measure activities have been conducted at the F-Pond through February 14, 2006.

2.3 Other Documentation

2.3.1 Photos

Photos of the corrective measures activities conducted at the North Ditch Staging Area are included in Attachment 2.

2.3.2 Daily Work Reports

Daily work reports which detail the activities conducted during North Ditch Staging Area corrective measure are included in Attachment 3.



2.3.3 Invoiced and Paid Work

Based on ENTACT's contract with Keystone, ENTACT cannot invoice for the North Ditch Staging Area or F-Pond corrective measures until each unit is completed. Therefore, no invoices have been submitted or paid to date. ENTACT anticipates the completion of the North Ditch Staging Area corrective measure by mid-March 2006 and the F-Pond corrective measure by the end of April 2006.

Based on the letter to Keystone dated February 16, 2006, from J. Adenuga of the USEPA confirming the agreement reached during a phone conference about the project, Keystone will be required to prepay ENTACT for all remaining corrective action work unbilled and not completed by April 21, 2006, in order to demonstrate financial assurance. Documentation of invoiced and paid work will be submitted in the Corrective Measures Status Report No. 2.



TABLE 1: CHARACTERIZATION SAMPLE ANALYTICAL RESULTS KEYSTONE STEEL & WIRE COMPANY PEORIA, ILLINOIS

Sample Date	Unit Name	Sample ID No.	Sample Description	Sample Location	Sample Depth (feet)	Laboratory Report No.	TCLP Lead (mg/l)
Criterla _							5_
11/23/05	North Ditch Staging Area	CS-ND-2-001	Characterization of hot spot	ND-2 sample location	_ 1	PDC 5113698	1.04
11/23/05	North Ditch Staging Area	CS-ND-3-001	Characterization of hot spot	ND-3 sample location	1.5	PDC 5113698	0.82
11/23/05	North Ditch Staging Area	CS-ND-4-001	Characterization of hot spot	ND-4 sample location	1	PDC 5113698	4
01/25/06	North Ditch Staging Area	CS-ND-SP1-001	Post in-situ treatment	Area 1		PDC 6013543	0.0061
01/25/06	North Ditch Staging Area	CS-ND-SP2-001	Post in-situ treatment	Area 2	-	PDC 6013543	0.24
01/25/06	North Ditch Staging Area	CS-ND-SP3-001	Post in-situ treatment	Area 3		PDC 6013543	0.043
01/25/06	North Ditch Staging Area	CS-ND-SP4-001	Post in-situ treatment	Area 4		PDC 6013543	0.016

TABLE 2: POST-EXCAVATION CONFIRMATION SAMPLE ANALYTICAL RESULTS KEYSTONE STEEL & WIRE COMPANY PEORIA, ILLINOIS

Sample Date	Unit Name	Sample ID No.	Sample Type	Sample Location	Sample Depth (ft)	Laboratory Report No.	Total Lead (mg/kg) Lead	TCLP Metals (mg/l) Lead
Remediatio	n Goal						800	5
02/03/06	NDSA	ECS-ND-A6-SWS-001	Grab	Grid A6, South sidewall	2	PDC 6021467	880	
02/03/06	NDSA	ECS-ND-A6-001	Grab	Grid A6, Bottom	2	PDC 6021467	170	
02/03/06	NDSA	ECS-ND-A6(X)-001	Grab	Grid A6, Bottom Duplicate	2	PDC 6021467	3300	
02/03/06	NDSA	ECS-ND-A6-SWE-001	Grab	Grid A6, East sidewall	2	PDC 6021467	4000	
02/03/06	NDSA	ECS-ND-A6-SWW-001	Grab	Grid A6, West sidewall	2	PDC 6021467	670	
02/03/06	NDSA	ECS-ND-A6-ND4-001	Grab	Grid A6, ND-4 sample location	2	PDC 6021467	2400	< 0.038
02/03/06	NDSA	ECS-ND-A5-001	Grab	Grid A5, Bottom	2	PDC 6021467	16000	
02/03/06	NDSA	ECS-ND-A5-SWW-001	Grab	Grid A5, West sidewall	2	PDC 6021467	200	
02/03/06	NDSA	ECS-ND-A5-SWE-001	Grab	Grid A5, East sidewall	2	PDC 6021467	3800	
02/03/06	NDSA	ECS-ND-A5-ND3-001	Grab	Grid A5, ND-3 sample location	2	PDC 6021467	2700	< 0.065
02/03/06	NDSA	ECS-ND-A2-SWW-001	Grab	Grid A2, West sidewall	2	PDC 6021467	71	
02/03/06	NDSA	ECS-ND-B4-SWS-001	Grab	Grid B4, South sidewall	2	PDC 6021467	9100	
02/03/06	NDSA	ECS-ND-A5-SWN-001	Grab	Grid A5, North sidewall	2	PDC 6021467	260	
02/03/06	NDSA	ECS-ND-A3-SWW-001	Grab	Grid A3, West sidewall	2	PDC 6021467	1200	
02/03/06	NDSA	ECS-ND-B3-SWE-001	Grab	Grid B3, East sidewall	2	PDC 6021467	23000	
02/03/06	NDSA	ECS-ND-A3-001	Grab	Grid A3, Bottom	2	PDC 6021467	33000	
02/03/06	NDSA	ECS-ND-A3(X)-001	Grab	Grid A3, Bottom Duplicate	2	PDC 6021467	93	
02/03/06	NDSA	ECS-ND-B3-001	Grab	Grid B3, Bottom	2	PDC 6021467	17000	
02/03/06	NDSA	ECS-ND-B2-SWE-001	Grab	Grid B2, East sidewall	2	PDC 6021467	920	
02/03/06	NDSA	ECS-ND-A2-SWN-001	Grab	Grid A2, North sidewall	2	PDC 6021467	76	
02/03/06	NDSA	ECS-ND-A3-ND2-001	Grab	Grid A3, ND-2 sample location	2	PDC 6021467	1900	0.05
02/03/06	NDSA	ECS-ND-B2-SWN-001	Grab	Grid B2, North sidewall	2	PDC 6021467	1600	
02/03/06	NDSA	ECS-ND-B2-BT-001	Grab	Grid B2, BT sample location	2	PDC 6021467	320	0.03

TABLE 3: WASTE DISPOSAL RECORD EYSTONE STEEL & WIRE COMPANY PEORIA, ILLINOIS

Shipment	No. of	Manifest	Unit	Ticket	Weight	Disposal
Date	Loads	No.	Name	No.	(tons)	Facility
01/30/06	1	11826501	North Ditch Staging Area	94798	27.48	Tazwell RDF
01/30/06	2	11826504	North Ditch Staging Area	94800	17.27	Tazwell RDF
01/30/06	3	11826502	North Ditch Staging Area	94802	23.72	Tazwell RDF
01/30/06	4	11826503	North Ditch Staging Area	94804	22.24	Tazwell RDF
01/30/06	5	11826505	North Ditch Staging Area	94805	19.56	Tazwell RDF
01/30/06	6	11826506	North Ditch Staging Area	94806	19.02	Tazwell RDF
01/30/06	7	11826507	North Ditch Staging Area	94807	17.96	Tazwell RDF
01/30/06	8	11826508	North Ditch Staging Area	94809	17.28	Tazwell RDF
01/30/06	9	11826509	North Ditch Staging Area	94810	18.54	Tazwell RDF
01/30/06	10	11826510	North Ditch Staging Area	94815	19.67	Tazwell RDF
01/30/06	11	11826511	North Ditch Staging Area	94816	19.67	Tazwell RDF
01/30/06	12	11826512	North Ditch Staging Area	94817	18.98	Tazwell RDF
01/30/06	13	11826513	North Ditch Staging Area	94819	20.33	Tazwell RDF
01/30/06	14	11826514	North Ditch Staging Area	94821	19.32	Tazwell RDF
01/30/06	15	11826515	North Ditch Staging Area	94822	19.63	Tazwell RDF
01/30/06	16	11826516	North Ditch Staging Area	94823	18.63	Tazwell RDF
01/30/06	17	11826517	North Ditch Staging Area	94824	18.86	Tazwell RDF
01/30/06	18	11826518	North Ditch Staging Area	94825	17.54	Tazwell RDF
01/30/06	19	11826519	North Ditch Staging Area	94832	20.08	Tazwell RDF
01/30/06	20	11826520	North Ditch Staging Area	94834	22.46	Tazwell RDF
01/30/06	21	11826521	North Ditch Staging Area	94837	21.86	Tazwell RDF
01/30/06	22	11826522	North Ditch Staging Area	94839	22.62	Tazwell RDF
01/30/06	23	11826523	North Ditch Staging Area	94841	20.63	Tazwell RDF
01/30/06	24	11826524	North Ditch Staging Area	94843	18.99	Tazwell RDF
01/30/06	25	11826525	North Ditch Staging Area	94844	19.79	Tazwell RDF
01/30/06	26	11826526	North Ditch Staging Area	94845	18.67	Tazwell RDF
01/30/06	27	11826527	North Ditch Staging Area	94851	22.15	Tazwell RDF
01/30/06	28	11826528	North Ditch Staging Area	94857	21.27	Tazwell RDF
01/30/06	29	11826529	North Ditch Staging Area	94860	21.03	Tazwell RDF
01/30/06	30	11826530	North Ditch Staging Area	94861	23.25	Tazwell RDF
01/30/06	31	11826531	North Ditch Staging Area	94862	20.2	Tazwell RDF
01/30/06	32	11826532	North Ditch Staging Area	94865	18.39	Tazwell RDF
01/30/06	33	11826533	North Ditch Staging Area	94870	19.76	Tazwell RDF
01/30/06	34	11826534	North Ditch Staging Area	94873	17.87	Tazwell RDF
01/30/06	35	11826535	North Ditch Staging Area	94885	17.77	Tazwell RDF
01/30/06	36	11826536	North Ditch Staging Area	94887	18.81	Tazwell RDF
01/30/06	37	11826537	North Ditch Staging Area	94886	18.06	Tazwell RDF
01/30/06	38	11826538	North Ditch Staging Area	94890	16.51	Tazwell RDF
01/30/06	39	11826539	North Ditch Staging Area	94891	19.12	Tazwell RDF
01/30/06	40	11826540	North Ditch Staging Area	94893	15.56	Tazwell RDF
01/30/06	41	11826541	North Ditch Staging Area	94894	19.76	Tazwell RDF
01/30/06	42	11826542	North Ditch Staging Area	94907	20.54	Tazwell RDF
01/30/06	43	11826543	North Ditch Staging Area	94909	22.57	Tazwell RDF
01/30/06	44	11826544	North Ditch Staging Area	94912	19.96	Tazwell RDF
01/30/06	45	11826545	North Ditch Staging Area	94913	21.76	Tazwell RDF
01/30/06	46	11825968	North Ditch Staging Area	94915	20.1	Tazwell RDF
01/30/06	47	11825970	North Ditch Staging Area	94916	20.86	Tazwell RDF
01/30/06	48	11825971	North Ditch Staging Area	94917	19.93	Tazwell RDF
0 1100100		1	Total Ditor Staging Alea	3,3,,	10.00	- ALTON INDI

TABLE 3: WASTE DISPOSAL RECORD EYSTONE STEEL & WIRE COMPANY PEORIA, ILLINOIS

Shipment	No. of	Manifest	Unit	Ticket	Weight	Disposal
Date	Loads	No.	Name	No.	(tons)	Facility
01/30/06	49	11825969	North Ditch Staging Area	128048	20.19	Tazwell RDF
01/30/06	50	11825972	North Ditch Staging Area	94926	18.92	Tazwell RDF
01/30/06	51	11825973	North Ditch Staging Area	94927	17.63	Tazwell RDF
01/30/06	52	11825974	North Ditch Staging Area	94928	18.35	Tazwell RDF
01/30/06	53	11825975	North Ditch Staging Area	94929	16.9	Tazwell RDF
01/30/06	54	11825976	North Ditch Staging Area	94930	18.18	Tazwell RDF
01/30/06	55	11825977	North Ditch Staging Area	94931	19.95	Tazwell RDF
01/30/06	56	11825978	North Ditch Staging Area	498951	16.76	Tazwell RDF
01/30/06	57	11825979	North Ditch Staging Area	498954	17.42	Tazwell RDF
01/31/06	58	11825980	North Ditch Staging Area	498965	18.63	Tazwell RDF
01/31/06	59	11825981	North Ditch Staging Area	498966	18.72	Tazwell RDF
01/31/06	60	11825982	North Ditch Staging Area	128052	16.15	Tazwell RDF
01/31/06	61	11825983	North Ditch Staging Area	128053	19.34	Tazwell RDF
01/31/06	62	11825984	North Ditch Staging Area	128054	16.08	Tazwell RDF
01/31/06	63	11825986	North Ditch Staging Area	128055	17.84	Tazwell RDF
01/31/06	64	11825985	North Ditch Staging Area	128056	17.51	Tazwell RDF
01/31/06	65	11825987	North Ditch Staging Area	94947	20.23	Tazwell RDF
01/31/06	66	11825988	North Ditch Staging Area	94948	19.87	Tazwell RDF
01/31/06	67	11825989	North Ditch Staging Area	94949	17.4	Tazwell RDF
01/31/06	68	11825990	North Ditch Staging Area	94950	19.63	Tazwell RDF
01/31/06	69	11825991	North Ditch Staging Area	94952	15.87	Tazwell RDF
01/31/06	70	11825992	North Ditch Staging Area	94954	19.42	Tazwell RDF
01/31/06	71	11825993	North Ditch Staging Area	498982	20.68	Tazwell RDF
01/31/06	72	11825995	North Ditch Staging Area	94961	19.56	Tazwell RDF
01/31/06	73	11825994	North Ditch Staging Area	94962	20.17	Tazwell RDF
01/31/06	74	11825996	North Ditch Staging Area	94963	21.39	Tazwell RDF
01/31/06	75	11825997	North Ditch Staging Area	94965	20.98	Tazwell RDF
01/31/06	76	11825998	North Ditch Staging Area	94966	23.1	Tazwell RDF
01/31/06	77	11825999	North Ditch Staging Area	94971	18.84	Tazwell RDF
01/31/06	78	11826547	North Ditch Staging Area	94973	18.78	Tazwell RDF
01/31/06	79	11826548	North Ditch Staging Area	499009	18.67	Tazwell RDF
01/31/06	80	11826549	North Ditch Staging Area	94977	18.83	Tazwell RDF
01/31/06	81	11826550	North Ditch Staging Area	94980	18.66	Tazwell RDF
01/31/06	. 82	11826551	North Ditch Staging Area	94981	20.66	Tazwell RDF
01/31/06	83	11826552	North Ditch Staging Area	94982	19.82	Tazwell RDF
01/31/06	84	11826546	North Ditch Staging Area	128064	18.43	Tazwell RDF
01/31/06	85	11826553	North Ditch Staging Area	94984	21.13	Tazwell RDF
01/31/06	86	11826544	North Ditch Staging Area	94988	22.24	Tazwell RDF
01/31/06	87	11826555	North Ditch Staging Area	94990	20.55	Tazwell RDF
01/31/06	88	11826556	North Ditch Staging Area	94991	20.12	Tazwell RDF
01/31/06	89	11826557	North Ditch Staging Area	94992	20.2	Tazwell RDF
01/31/06	90	11826558	North Ditch Staging Area	94993	18.17	Tazwell RDF
01/31/06	91	11826559	North Ditch Staging Area	94994	20.58	Tazwell RDF
01/31/06	92	11826560	North Ditch Staging Area	94996	19.31	Tazwell RDF
01/31/06	93	11826561	North Ditch Staging Area	95003	17.77	Tazwell RDF
01/31/06	94	11826562	North Ditch Staging Area	95006	20.27	Tazwell RDF
01/31/06	95	11826563	North Ditch Staging Area	95010	19.21	Tazwell RDF
01/31/06	96	11826564	North Ditch Staging Area	95012	20.42	Tazwell RDF

TABLE 3: WASTE DISPOSAL RECORD EYSTONE STEEL & WIRE COMPANY PEORIA, ILLINOIS

Shipment	No. of	Manifest	Unit	Ticket	Weight	Disposal
Date	Loads	No.	Name	No.	(tons)	Facility
01/31/06	97	11826565	North Ditch Staging Area	95013	18.33	Tazwell RDF
01/31/06	98	11826566	North Ditch Staging Area	95014	21.28	Tazwell RDF
01/31/06	99	11826567	North Ditch Staging Area	95016	18.45	Tazwell RDF
01/31/06	100	11826568	North Ditch Staging Area	95017	15.51	Tazwell RDF
01/31/06	101	11826569	North Ditch Staging Area	95026	21.8	Tazwell RDF
01/31/06	102	11826570	North Ditch Staging Area	95027	19.27	Tazwell RDF
01/31/06	103	11826571	North Ditch Staging Area	95028	19.09	Tazwell RDF
01/31/06	104	11826572	North Ditch Staging Area	95030	20.27	Tazwell RDF
01/31/06	105	11826573	North Ditch Staging Area	95031	19.85	Tazwell RDF
01/31/06	106	11826574	North Ditch Staging Area	95034	21.54	Tazwell RDF
01/31/06	107	11826575	North Ditch Staging Area	95037	19.66	Tazwell RDF
01/31/06	108	11826576	North Ditch Staging Area	95043	22.91	Tazwell RDF
01/31/06	109	11826577	North Ditch Staging Area	499080	20.85	Tazwell RDF
01/31/06	110	11826578	North Ditch Staging Area	95047	20.04	Tazwell RDF
01/31/06	111	11826579	North Ditch Staging Area	95050	21.01	Tazwell RDF
01/31/06	112	11826580	North Ditch Staging Area	95051	20,34	Tazwell RDF
01/31/06	113	11826581	North Ditch Staging Area	95052	19.69	Tazwell RDF
02/01/06	114	11826582	North Ditch Staging Area	499101	18.86	Tazwell RDF
02/01/06	115	11826583	North Ditch Staging Area	499103	17.8	Tazwell RDF
02/01/06	116	11826000	North Ditch Staging Area	499105	17.35	Tazwell RDF
02/01/06	117	8709206	North Ditch Staging Area	499106	20.25	Tazwell RDF
02/01/06	118	8709207	North Ditch Staging Area	499110	22.47	Tazwell RDF
02/01/06	119	8709209	North Ditch Staging Area	499115	20.51	Tazwell RDF
02/01/06	120	8709210	North Ditch Staging Area	499117	18.41	Tazwell RDF
02/01/06	121	8709208	North Ditch Staging Area	499123	20.13	Tazwell RDF
02/01/06	122	8709211	North Ditch Staging Area	499129	21.42	Tazwell RDF
Total					2392.65	

ATTACHMENT 1 LABORATORY ANALYTICAL REPORTS





P.O. Box 9071 • Peoria, IL 61612-9071 (309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689



Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Sample No: 06021467-1 Collect Date: 03-Feb-06 14:00

Client Id: JOB #D1154 Site: ECS-ND-A6-SWS-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst

Moisture 12.9 % 07-Feb-06 13:34 AG

SW6010B Result Units Date/Time Analyst

Lead 880 mg/kg Dry 07-Feb-06 12:03 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB

Sample No: 06021467-2 Collect Date: 03-Feb-06 14:02

Client Id: JOB #D1154 Site: ECS-ND-A6-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst Moisture 13.2 % 07-Feb-06 13:35 AG

SW6010B Result Units Date/Time Analyst Lead 170 mg/kg Dry 07-Feb-06 13:42 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB



P.O. Box 9071 • Peoria, IL 61612-9071 (309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689



Entact - Dallas Office 3129 Bass Pro Drive

Date Received: Date Reported

03-Feb-06 08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Sample No: 06021467-3

Collect Date: 03-Feb-06 14:05

Client Id: JOB #D1154

Site: ECS-ND-A6-SWE-001-2

Locator: GRAB

SM2540B

Result

Analyst Date/Time

Moisture

9.8 %

07-Feb-06 13:37

AG

SW6010B

Units Result

Date/Time

Analyst

Units

JVH

Lead

SW-846 3051

4000 mg/kg Dry

07-Feb-06 13:50

Sample Preparation

Result Units

Date/Time 06-Feb-06 13:00

Analyst DAB

Sample No: 06021467-4 Client Id: JOB #D1154

Site: ECS-ND-A6-SWW-001-2

Result

Collect Date: 03-Feb-06 14:20

Locator: GRAB

SM2540B

Moisture

Units

Units

Date/Time Analyst

19 %

07-Feb-06 13:39 AG

SW6010B

Result Units

JVH

Lead

670 mg/kg Dry

Date/Time 07-Feb-06 13:55

Result

Date/Time 06-Feb-06 13:00 Analyst DAB

Analyst

SW-846 3051

Sample Preparation



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Grapevine, TX 76051

Date Reported

08-Feb-06

Attn: Ms. Jenny Elste

Collect Date: 03-Feb-06 14:07

Sample No: 06021467-5 Client ld: JOB #D1154

Site: ECS-ND-A6-ND4-001-2

Locator: GRAB

Units Analyst SM2540B Result Date/Time 11.5 % 07-Feb-06 13:40 AG Moisture Analyst Result Units Date/Time SW6010B JVH 2400 mg/kg Dry 07-Feb-06 13:59 Lead Units Analyst Result Date/Time SW6010B TCLP Lead, TCLP 0.038 mg/l 07-Feb-06 10:33 JVH Units Analyst SW-846 1311 Result Date/Time 8.68 06-Feb-06 11:15 DAB Final pH DAB 06-Feb-06 11:15 Leachate Preparation Units Analyst SW-846 3015 Result Date/Time DAB Sample Preparation 07-Feb-06 5:00 Units SW-846 3051 Result Date/Time Analyst 06-Feb-06 13:00 DAB Sample Preparation



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Sample No: 06021467-6

Client Id: JOB #D1154

Collect Date: 03-Feb-06 14:10

Site: ECS-ND-A5-001-2

Locator: GRAB

SM2540B Result Units Date/Time **Analyst** 16.9 % 07-Feb-06 13:43 AG Moisture Analyst SW6010B Result Units Date/Time 16000 mg/kg Dry 07-Feb-06 14:08 JVH Lead Units Analyst SW-846 3051 Result Date/Time

Sample No: 06021467-7

Sample Preparation

Collect Date: 03-Feb-06 14:12

06-Feb-06 13:00

DAB

Client Id: JOB #D1154

Site: ECS-ND-A5-SWW-001-2

Result

Locator: GRAB

SM2540B

8.56 %

Date/Time **Analyst**

Moisture

07-Feb-06 13:44 AG

SW6010B

Result Units Date/Time Analyst

Lead

200 mg/kg Dry

Units

07-Feb-06 14:12 JVH

Result

Units

Date/Time Analyst

SW-846 3051

Sample Preparation

DAB 06-Feb-06 13:00



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Sample No: 06021467-8

Client Id: JOB #D1154

Collect Date: 03-Feb-06 14:14

Site: ECS-ND-A5-SWE-001-2

Locator: GRAB

Result Units Date/Time Analyst SM2540B 9.75 % 07-Feb-06 13:45 AG Moisture SW6010B Result Units Date/Time Analyst JVH 3800 mg/kg Dry 07-Feb-06 14:17 Lead Units Analyst SW-846 3051 Result Date/Time 06-Feb-06 13:00 DAB Sample Preparation



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Entact - Dallas Office

Date Received:

03-Feb-06

3129 Bass Pro Drive

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Collect Date: 03-Feb-06 14:18

Sample No: 06021467-9		Collect Date:	03-Feb-06 14:18
Client Id: JOB #D1154	Site: ECS-ND-A5-ND3-001-2	2 Locat	or: GRAB
SM2540B	Result Units	Date/Time	Analyst
Moisture	12.5 %	07-Feb-06 13:48	AG
SW6010B	Result Units	Date/Time	Analyst
Lead	2700 mg/kg [Dry 07-Feb-06 14:30	JVH
SW6010B TCLP	Result Units	Date/Time	Analyst
Lead, TCLP	0.065 mg/l	07-Feb-06 10:49	JVH
SW-846 1311	Result Units	Date/Time	Analyst
Final pH	6.36	06-Feb-06 11:15	DAB
Leachate Preparation		06-Feb-06 11:15	DAB
SW-846 3015	Result Units	Date/Time	Analyst
Sample Preparation		07-Feb-06 5:00	DAB
SW-846 3051	Result Units	Date/Time	Analyst
Sample Preparation		06-Feb-06 13:00	DAB



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received: Date Reported

03-Feb-06 08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Collect Date: 03-Feb-06 14:34

Locator: GRAB

Sample No: 06021467-10 Client Id: JOB #D1154

Site: ECS-ND-A2-SWW-001-2

Units Analyst Result Date/Time

19.4 %

07-Feb-06 13:48 AG

Units Result

Analyst Date/Time

71 mg/kg Dry 07-Feb-06 14:34 JVH

SW-846 3051

Lead

SM2540B

SW6010B

Moisture

Result Units Date/Time

Analyst

DAB 06-Feb-06 13:00

Sample No: 06021467-11

Sample Preparation

Client Id: JOB #D1154

Collect Date: 03-Feb-06 14:22

Site: ECS-ND-A4-SWS-001-2

Result

Locator: GRAB

SM2540B

SW6010B

Moisture

07-Feb-06 13:51

11.5 %

Date/Time

Result Units

Analyst Date/Time

Analyst

1100 mg/kg Dry

Units

Units

07-Feb-06 14:38

Result

Analyst

JVH

Date/Time

SW-846 3051

Lead

Sample Preparation

DAB 06-Feb-06 13:00



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Reported 08-Feb-06

Sample No: 06021467-12 Client Id: JOB #D1154

Collect Date: 03-Feb-06 14:24

Site: ECS-ND-B4-SWS-001-2

Result

10.7 %

Locator: GRAB

SM2540B Moisture SW6010B

Analyst Date/Time 07-Feb-06 13:52

Lead

Units Date/Time Analyst Result

9100 mg/kg Dry

Units

Units

JVH 07-Feb-06 14:42

SW-846 3051 Result Sample Preparation

Analyst Date/Time

06-Feb-06 13:00 DAB

Sample No: 06021467-13

Collect Date: 03-Feb-06 14:16

Client Id: JOB #D1154

Site: ECS-ND-A5-SWN-001-2

Locator: GRAB

JVH

SM2540B

Result Units Date/Time Analyst

Moisture

Sample Preparation

7.89 %

07-Feb-06 13:57 AG

SW6010B

Lead

Result Units Date/Time **Analyst**

260 mg/kg Dry

07-Feb-06 14:47

SW-846 3051

Units Result

Date/Time Analyst

06-Feb-06 13:00 DAB



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Entact - Dallas Office 3129 Bass Pro Drive Date Received:

03-Feb-06

0120 20001 10 21110

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Client Id: JOB #D1154

Sample No: 06021467-14

Collect Date: 03-Feb-06 14:26

Site: ECS-ND-A3-SWW-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst

Moisture 14.6 % 07-Feb-06 13:59 AG

SW6010B Result Units Date/Time Analyst

Lead 1200 mg/kg Dry 07-Feb-06 14:51 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB

Sample No: 06021467-15 Collect Date: 03-Feb-06 14:28

Client ld: JOB #D1154 Site: ECS-ND-B3-SWE-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst

Moisture 9.78 % 07-Feb-06 13:59 AG

SW6010B Result Units Date/Time Analyst

Lead 23000 mg/kg Dry 07-Feb-06 14:55 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received: Date Reported

03-Feb-06 08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Collect Date: 03-Feb-06 14:30

Locator: GRAB

Sample No: 06021467-16 Client Id: JOB #D1154

Moisture

SW6010B

Lead

SW-846 3051

Site: ECS-ND-A3-001-2

SM2540B

Result Units Date/Time Analyst

14.7 %

07-Feb-06 14:00

Units Result

Analyst Date/Time

33000 mg/kg Dry 07-Feb-06 14:59

Result Units

Analyst Date/Time

06-Feb-06 13:00 DAB

Sample No: 06021467-17

Sample Preparation

Client Id: JOB #D1154

Collect Date: 03-Feb-06 14:32

Site: ECS-ND-B3-001-2

Result

Locator: GRAB

SM2540B

Moisture

19.2 %

Date/Time Analyst

07-Feb-06 14:02 AG

SW6010B

Lead

SW-846 3051

Result

Date/Time

17000 mg/kg Dry

Units

07-Feb-06 15:37 JVH

Result Units Date/Time

Analyst

Analyst

DAB Sample Preparation 06-Feb-06 13:00

Page 10 of 16



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received: Date Reported

03-Feb-06 08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Collect Date: 03-Feb-06 14:36

Site: ECS-ND-B2-SWE-001-2

Locator: GRAB

SM2540B

Units

Date/Time

Analyst

Moisture

Result

15 %

07-Feb-06 14:03

AG

SW6010B

Result

Units

Date/Time

Analyst

Lead

920 mg/kg Dry

07-Feb-06 16:05

JVH

SW-846 3051

Sample Preparation

Sample No: 06021467-18

Client Id: JOB #D1154

Units Result

Date/Time

Analyst

06-Feb-06 13:00 DAB

Sample No: 06021467-19

Client Id: JOB #D1154

Sample Preparation

Collect Date: 03-Feb-06 14:38

Site: ECS-ND-A2-SWN-001-2

Result

Locator: GRAB

SM2540B

Moisture

21.5 %

Units

Date/Time

Analyst AG

SW6010B

Lead

Units Result

07-Feb-06 14:05

Analyst JVH

Date/Time

76 mg/kg Dry

Units

07-Feb-06 16:09

SW-846 3051

Result

Date/Time

Analyst

DAB 06-Feb-06 13:00



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Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Grapevine, TX 76051

Date Reported

08-Feb-06

Attn: Ms. Jenny Elste

Sample No: 06021467-20

Collect Date: 03-Feb-06 14:40

Client Id: JOB #D1154

Site: ECS-ND-B2-SWN-001-2

Locator: GRAB

SM2540B

Result Units

Date/Time

Analyst

Moisture

14.2 %

07-Feb-06 14:06

AG

SW6010B

Result Units Date/Time

Analyst

Lead

1600 mg/kg Dry

07-Feb-06 16:13

JVH

SW-846 3051

Result Units Date/Time

Analyst

Sample Preparation

06-Feb-06 13:00 DAB



P.O. Box 9071 • Peoria, IL 61612-9071 (309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689



Entact - Dallas Office 3129 Bass Pro Drive

Date Received:

03-Feb-06

Grapevine, TX 76051

Date Reported

08-Feb-06

Attn: Ms. Jenny Elste

Sample No: 06021467-21 Collect Date: 03-Feb-06 14:42 Client Id: JOB #D1154 Site: ECS-ND-A3-ND2-001-2 Locator: GRAB Result Units Date/Time Analyst

SM2540B Moisture 10.6 % 07-Feb-06 14:14 AG SW6010B Result Units Date/Time Analyst Lead 1900 mg/kg Dry 07-Feb-06 16:17 JVH SW6010B TCLP Result Units Date/Time Analyst Lead, TCLP 0.05 mg/l 07-Feb-06 10:54 JVH SW-846 1311 Result Units Date/Time Analyst Final pH 6.35 06-Feb-06 11:15 DAB Leachate Preparation 06-Feb-06 11:15 DAB SW-846 3015 Units Result Date/Time Analyst Sample Preparation 07-Feb-06 5:00 DAB SW-846 3051 Result Units Analyst Date/Time Sample Preparation DAB 06-Feb-06 13:00



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Entact - Dallas Office 3129 Bass Pro Drive Date Received:

03-Feb-06

Grapevine, TX 76051

Date Reported

06-Feb-06 13:00

DAB

08-Feb-06

Attn: Ms. Jenny Elste

Sample Preparation

Sample No: 06021467-22		A.d.	913 J T	Collect	Date:	03-Feb-06 14:44	1
Client Id: JOB #D1154	Site: EC	S-ND-B2-B	T-001-2		Locate	or: GRAB	4
SM2540B		Result	Units	Date/	Time	Analyst	
Moisture		12.2	%	07-Feb-06	14:15	AG	
SW6010B		Result	Units	Date/	Time	Analyst	
Lead		320	mg/kg Dry	07-Feb-06	16:21	JVH	
SW6010B TCLP		Result	Units	Date/1	Time	Analyst	
Lead, TCLP	J	0.03	mg/l	07-Feb-06	10:59	JVH	
SW-846 1311		Result	Units	Date/1	ime	Analyst	
Final pH		6.33		06-Feb-06	11:15	DAB	
Leachate Preparation				06-Feb-06	11:15	DAB	
SW-846 3015		Result	Units	Date/1	ime	Analyst	
Sample Preparation				07-Feb-06	5:00	DAB	
SW-846 3051		Result	Units	Date/1	ime	Analyst	



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Entact - Dallas Office 3129 Bass Pro Drive Date Received:

03-Feb-06

3129 Bass Pro Drive

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Client Id: JOB #D1154

Sample No: 06021467-23 Collect Date

Collect Date: 03-Feb-06 14:30

Site: ECS-ND-A3(X)-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst

Moisture 17.3 % 07-Feb-06 14:16 AG

SW6010B Result Units Date/Time Analyst

Lead 93 mg/kg Dry 07-Feb-06 16:25 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB

Sample No: 06021467-24 Collect Date: 03-Feb-06 14:02

Client Id: JOB #D1154 Site: ECS-ND-A6(X)-001-2 Locator: GRAB

SM2540B Result Units Date/Time Analyst

Moisture 12.9 % 07-Feb-06 14:18 AG

SW6010B Result Units Date/Time Analyst

Lead 3300 mg/kg Dry 07-Feb-06 16:38 JVH

SW-846 3051 Result Units Date/Time Analyst

Sample Preparation 06-Feb-06 13:00 DAB



P.O. Box 9071 • Peoria, IL 61612-9071 (309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689



Entact - Dallas Office 3129 Bass Pro Drive Date Received:

03-Feb-06

Date Reported

08-Feb-06

Grapevine, TX 76051

Attn: Ms. Jenny Elste

0 05 11

Lisa Grant, Project Manager

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230

State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533

State of Arkansas Certified Wastewater and Hazardous Waste Lab

State of Indiana Certified Drinking Water Lab No. C-IL-04

State of Iowa Certified Wastewater Lab No. 240

American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206

State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094

State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430



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Entact - Dallas Office 3129 Bass Pro Drive Grapevine, TX 76051 Date Received:

25-Jan-06

Date Reported

27-Jan-06

Attn: Ms. Jenny Elste

Sample No: 06013543-1			Co	llect Date: 25-Jan-06 8:30	
Client ld: JOB #D1154	Site: CS-ND-SP1-C		Locator: KEYSTONE		
	Result		Units	Date / Time	Ву
SW6010B TCLP					
Lead, TCLP	J	0.0061	mg/l	27-Jan-06 7:37	HVL
SW-846 1311					
Final pH		5.68		26-Jan-06 11:45	MML
Leachate Preparation				26-Jan-06 11:45	MML
SW-846 3015					
Sample Preparation				27-Jan-06 5:00	JMM

Sample No: 06013543-2		C	ollect Date: 25-Jan-06 8:34	
Client Id: JOB #01154	Site: CS-ND-SP2-001		Locator: KEYSTONE	
	Result	Units	Date / Time	Ву
SW6010B TCLP				
Lead, TCLP	0.24	mg/l	27-Jan-06 7:41	JVH
SW-846 1311				
Final pH	5.36	3	26-Jan-06 11:45	JMM
Leachate Preparation			26-Jan-06 11:45	JMM
SW-846 3015				
Sample Preparation			27-Jan-06 5:00	JMM



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Entact - Dallas Office 3129 Bass Pro Drive Grapevine, TX 76051 Date Received:

25-Jan-06

Date Reported

27-Jan-06

Attn: Ms. Jenny Elste

Sample No: 06013543-3			Collect Date: 25-Jan-06 8:36		
Client ld: JOB #D1154	Site: CS-ND-SP3-001	Locator: KEYSTONE			
	Result	Units	Date / Time	Ву	
SW6010B TCLP					
Lead, TCLP	0.04	3 mg/l	27-Jan-06 7:44	JVH	
SW-846 1311					
Final pH	5.5	1	26-Jan-06 11:45	JMM	
Leachate Preparation			26-Jan-06 11:45	JMM	
SW-846 3015					
Sample Preparation			27-Jan-06 5:00	JMM	
Sample No: 06013543-4			Collect Date: 25-Jan-06 8:38		
Client Id: JOB #D1154	Site: CS-ND-SP4-001		Locator: KEYSTONE		
	Result	Units	Date / Time	Ву	
SW6010B TCLP					
Lead, TCLP	0.01	6 mg/l	27-Jan-06 7:48	JVH	
SW-846 1311					
Final pH	5.	5	26-Jan-06 11:45	JMM	
Leachate Preparation			26-Jan-06 11:45	JMM	
SW-846 3015					
Sample Preparation			27-Jan-06 5:00	JMM	



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Entact - Dallas Office 3129 Bass Pro Drive Grapevine, TX 76051 Date Received:

25-Jan-06

Date Reported

27-Jan-06

Attn: Ms. Jenny Elste

Certified by:

Lisa Grant, Project Manager

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230

State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533

State of Arkansas Certified Wastewater and Hazardous Waste Lab

State of Indiana Certified Drinking Water Lab No. C-IL-04

State of Iowa Certified Wastewater Lab No. 240

American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206

State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094

State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

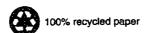
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Entact - Keystone Steel & Wire Site

RDL/MDL Table

Parameter	RDL	MDL		
Lead, TCLP	0.0075 mg/l	0.0085 mg/l		

PDC Laboratories, Inc.



CHAIN OF CUSTODY RECORD

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JOB NUMBER TO 1154

PROJECT INFORMATION

NAME KENGTONE

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3	CS-ND-583-00	Λ	012506	0836	[5]	Υ			X				~	X								
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CASE NARRATIVE - Entact - Keystone Steel & Wire Site

PDC Laboratories, Inc. received 4 samples on January 25, 2005 at 15:00on ice and in good condition. This sample set was designated as Sample Delivery Group 06013543. All samples were for TCLP Lead. A turnaround time of 48 hours was requested.

Sample.	e		
Field	Lab ID	Collected	Received
CS-ND-SP1-001-0	06013543-1	01/25/06	01/25/06
CS-ND-SP2-001	06013543-2	01/25/06	01/25/06
CS-ND-SP3-001	06013543-3	01/25/06	01/25/06
CS-ND-SP4-001	06013543-4	01/25/06	01/25/06

Project Summary

Samples were prepared and/or analyzed utilizing the methodologies as listed on the attached report.

Trace Metals Summary

All holding time criteria were met for all samples.

All Initial Calibration, Initial Calibration Verification and Continuing Calibration Verification Standards were within acceptance limits.

All Method Blanks, Initial Calibration Blanks and Continuing Calibration Blanks were free of contamination for target analytes above report limits (RL).

All associated Laboratory Control Sample (LCS) recoveries were within acceptance limits.

All Interference Check Samples were within QC criteria.

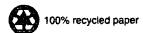
The Matrix Spike and Matrix Spike Duplicate performed on the sample had all recoveries were within acceptance limits and the RPD's were within acceptance limits. Since batch QC was not performed on an Entact sample this data is not provided in this QC summary.

Certification

This data package is in compliance with PDC Laboratories, Inc Quality Control Plan. Release of the data contained in this hard copy data package has been authorized by the Laboratory Manager or his designee, as verified by the following signature. A full QC summary for metals and inorganic analysis and a forms package for organic analysis are attached with this final report.

Signature:	Bus & Short	Name:	Lisa Y. Grant
Date:	2/1/06	Title:	Project Manager

PDC Laboratories, Inc.



TCLP METALS QC SUMMARY

PDC Laboratories Quality Control Summary Report

TECT: 06013543

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)

CONTINUING CALIBRATION VERIFICATION

CONTINUING CALIBRATION VERIFICATION

.aboratory ID: WG11	7522-3 Ar	nalysis	Lot: WG11752	2 Sample	Tag: D1:1		
	Analyte	Units	Spiked	Measured	Recovery	Limits	Analysis Date
.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Lead, TCLP	MG/L	4.0	4.0	100	90.0-110	27-Jan-06 07:18
Laboratory ID: WG11	17522-5 Ar	nalysis	Lot: WG11752	2 Sample	Tag: D1:1		
	Analyte	Units	Spiked	Measured	*Recovery	Limits	Analysis Date
	Lead, TCLP	MG/L	4.0	4.1	102	90.0-110	27-Jan-06 08:19

PDC Laboratories Quality Control Summary Report

JECT: 06013543

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)

C CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
06013543-1	CS-ND-SP1-001-0	WG117510	WG117522	27-Jan-06 07:37	JVH	SW6010B	D1:1
06013543-2	CS-ND-SP2-001	WG117510	WG117522	27-Jan-06 07:41	JAH	SW6010B	D1:1
06013543-3	CS-ND-SP3-001	WG117510	WG117522	27-Jan-06 07:44	JVH	SW6010B	D1:1
06013543-4	CS-ND-SP4-001	WG117510	WG117522	27-Jan-06 07:48	JVH	SW6010B	D1:1

METHOD BLANK

Laboratory ID: WG117510-1	Analysis	Lot: WG117522	Prep	Batch: WG117510	Sample Tag: D1:1
Analyte	Units	Value	RDL	Analysis Date	
Lead, TCLF	_		0.0075	27-Jan-06 07:28	

LABORATORY CONTROL SAMPLE

Laboratory ID: WG117510-2	Analysi	s Lot: WG11	7522 Samp	le Tag: D1:	1	
Analyte		•	Measured		Limits	Analysis Date
Lead, TCLP		5.56	5.90		80.0-120	27-Jan-06 07:32

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG117522-1 Analysis Lot: WG117522 Sample Tag: D1:1							
	Analyte		-	Measured	· · · · · •	Limita	Analysis Date
	ead, TCLP			4.1		90.0-110	27-Jan-06 06:24

INITIAL CALIBRATION BLANK

Laboratory ID:	WG117522-2	Analyai	s Lot: WG11	7522	
	Analyte		Value	RDL	Analysis Date
	Lead, TCLP		0.00750		27-Jan-06 06:31

CONTINUING CALIBRATION BLANK

La	boratory ID	: WG117522-4	Analy	yais Lot: WC	3117522			
		Analyte	Units	Value	RDL	Analysis Date		
-		Lead, TCLP	MG/L	0.00750	0.0075	27-Jan-06 07:23		
La	aboratory ID	: WG117522-6	Analy	ysis Lot: WO				
		Analyte	Units	Value	RDL	Analysis Date		
-		Lead, TCLP	MG/L	0.00750	0.0075	27-Jan-06 08:24		

Page: 1 30-Jan-2006 07:01



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Entact - Dallas Office 3129 Bass Pro Drive Grapevine, TX 76051 Date Received:

23-Nov-05

Date Reported

02-Dec-05

Attn: Ms. Jenny Elste

Sample No: 05113698-1

Collect Date: 22-Nov-05 14:30

SW6010B TCLP 94 % Lead Spike Recovery 94 % Lead, TCLP 1.04 mg SW-846 1311 5.14	
Lead Spike Recovery 94 % Lead, TCLP 1.04 mg SW-846 1311 5.14	
Lead, TCLP 1.04 mg SW-846 1311 Final pH 5.14	
SW-846 1311 Final pH 5.14	mail 01 Doc 05 7:00 KMC
Final pH 5.14	טאוא טייי פט-טפט-וט אואנט
	29-Nov-05 14:00 JMM
Leachate Preparation	29-Nov-05 14:00 JMM
SW-846 3015	
Sample Preparation	30-Nov-05 5:00 JMM

Sample No: 05113698-2		(Collect Date: 22-Nov-05 14:25				
Client Id: PROJECT #D-1154	Site: CS-ND-3-001-1.5		Locator: GRAB				
	Result	Units	Date / Time	Ву			
SW6010B TCLP							
Lead Spike Recovery	94	%	01-Dec-05 7:00	KMC			
Lead, TCLP	0.82	mg/l	01-Dec-05 7:00	KMC			
SW-846 1311							
Final pH	6.04		29-Nov-05 14:00	JMM			
Leachate Preparation			29-Nov-05 14:00	MML			
SW-846 3015							
Sample Preparation			30-Nov-05 5:00	JMM			



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Entact - Dallas Office 3129 Bass Pro Drive Grapevine, TX 76051 Date Received:

23-Nov-05

Date Reported

02-Dec-05

Attn: Ms. Jenny Elste

Sample No: 05113698-3

Collect Date: 22-Nov-05 14:20

Client Id: PROJECT #D-1154	Site: CS-ND-4-001-1	Locator: GRAB		
	Result	Units	Date / Time	Ву
SW6010B TCLP				
Lead Spike Recovery	94	%	01-Dec-05 7:00	KMC
Lead, TCLP	4	mg/l	01-Dec-05 7:00	KMC
SW-846 1311				
Final pH	5.92		29-Nov-05 14:00	JMM
Leachate Preparation			29-Nov-05 14:00	JMM
SW-846 3015				
Sample Preparation			30-Nov-05 5:00	JMM

Certified by:

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State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230

State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533

State of Arkansas Certified Wastewater and Hazardous Waste Lab

State of Indiana Certified Drinking Water Lab No. C-IL-04

State of Iowa Certified Wastewater Lab No. 240

American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206

State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094

State of Wisconsin Certified Wastawater and Hazardous Waste Lab ID No. 998294430

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CASE NARRATIVE - Entact - Keystone Steel & Wire Site

PDC Laboratories, Inc. received 3 samples on November 23, 2005 at 14:10 on ice and in good condition. This sample set was designated as Sample Delivery Group 05113698. All samples were for TCLP Lead. A turnaround time of 2 days was requested. Due to sample numbers, the Thanksgiving holiday and work load at PDC Laboratories, Inc a TAT of 5 days was settled on.

Sample	D's	Date					
Field	Lab ID	Collected	Received				
CS-ND-2-001-1	05113698-1	11/22/05	11/23/05				
CS-ND-3-001-1.5	05113698-2	11/22/05	11/23/05				
CS-ND-4-001-1	05113698-3	11/22/05	11/23/05				

Project Summary

Samples were prepared and/or analyzed utilizing the methodologies as listed on the attached report.

Trace Metals Summary

All holding time criteria were met for all samples.

All Initial Calibration, Initial Calibration Verification and Continuing Calibration Verification Standards were within acceptance limits.

All Method Blanks, Initial Calibration Blanks and Continuing Calibration Blanks were free of contamination for target analytes above report limits (RL) with the following exception: CCV analyzed 8:17 had concentration of 0.0078 mg/l present. RL is 0.0075. Presence had no impact on sample data. All results were sufficiently high or not detectable to be effected by the amount in this CCV.

All associated Laboratory Control Sample (LCS) recoveries were within acceptance limits.

All Interference Check Samples were within QC criteria. Not included in QC summary. IECs are verified weekly as acceptable. Not analyzed on the day of this analysis.

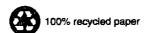
The Matrix Spike and Matrix Spike Duplicate performed on the sample batch (not performed on an Entact sample) had all recoveries and RPD's within acceptance limits.

Certification

This data package is in compliance with PDC Laboratories, Inc Quality Control Plan. Release of the data contained in this hard copy data package has been authorized by the Laboratory Manager or his designee, as verified by the following signature. A full QC summary for metals and inorganic analysis and a forms package for organic analysis are attached with this final report.

Signature:	Sono I specificant	Name:	Lisa Y. Grant
Date:	12/7/05	Title:	Project Manager

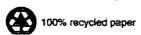
PDC Laboratories, Inc.



Entact - Keystone Steel & Wire Site

RDL/MDL Table

Parameter	RDL	MDL		
Lead, TCLP	0.0075 mg/l	0.0051 mg/l		
Chromium, TCLP	0.004 mg/l	0.001 mg/l		
Arsenic, Total	2.5 mg/kg	0.018 mg/kg		
Cadmium, Total	0.25 mg/kg	0.0029 mg/kg		
Lead, Total	1.2 mg/kg	0.01 mg/kg		
Silver, Total	1.2 mg/kg	0.0053 mg/kg		
Arsenic, SPLP	0.05 mg/l	0.023 mg/l		
Cadmium, SPLP	0.002 mg/l	0.0008 mg/l		
Lead, SPLP	0.0075 mg/l	0.0051 mg/l		
Silver, SPLP	0.01 mg/l	0.0038 mg/l		
Benzo(a)anthracene, Total	330 ug/kg	55 ug/kg		
Benzo(a)pyrene, Total	330 ug/kg	101 ug/kg		
Benzo(b)fluoranthene, Total	330 ug/kg	117 ug/kg		



METALS – TCLP DATA SUMMARY

PDC Laboratories Quality Control Summary Report

JECT: 05113698

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)

OC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot Analysis Lot		Analyst	Method Sample Tag
05113698-1	CS-ND-2-001-1	WG115307	01-Dec-05 07:00	RMC	SW6010B
05113698 - 2	CS-ND-3-001-1.5	₩G115307	01-Dec-05 07:00	KMC	SW6010B
05113698-3	CS-ND-4-001-1	WG115307	01-Dec-05 07:00	KMC	SW6010E

METHOD BLANK

Laboratory ID: WG115323-1	Analysi	# Lot: WG1153	07 Prep	Batch: N/A	Sample Tag:
Analyte	Units	Value	RDL	Analysis	Date
Lead, TCLP		0.00750	0.0075	01-Dec-05	

LABORATORY CONTROL SAMPLE

Laboratory ID: WG115	323-2	Analysi	is Lot: WG11	15307 Saumur	ole Tag:			
		e Units	•		*Recovery		Analysis	
	Lead, TCL		5.00			80.0-120	01-Dec-05	

INITIAL CALIBRATION VERIFICATION

Daboratory 1D: MG113323*3			warasi	.a 100. HG11	1930) 94114	ore rag:		
		Analyte					Limits	Analysis Date
	1	Lead, TCLP		2.00	2.0		90-0-110	01-Dec-05 07:01

INITIAL CALIBRATION BLANK

Laboratory ID: WG115323-4	Analysi	s Lot: WG11	.5307	
Analyte		Value	RDL	Analysis Date
Lead, TCLP		0.00750		01-Dec-05 07:05

CONTINUING CALIBRATION BLANK

Laboratory	ID:	WG115323-10	Ana	lysis Lot: 1	NG115307	
		Analyte	Units	Value	RDL	Analysis Date
		Lead, TCLP	MG/L	0.0023J	0.0075	01-Dec-05 10:00
Laboratory	ID:	WG115323-6	Anal	ysis Lot: W	3115307	
		Analyte	Units	Value	RDL	Analysis Date
		Lead, TCLP	MG/L	0.0078B	0.0075	01-Dec-05 08:17

Page : 1 07-Dec-2005 10:12

PDC Laboratories, Inc.



PDC Laboratories Quality Control Summary Report

OJECT: 05113698

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)

CONTINUING CALIBRATION BLANK

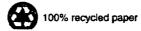
Laboratory ID: WG115323-8	Analy	rsis Lot: WG	115307	
Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0017J	0.0075	01-Dec-05 09:09

CONTINUING CALIBRATION VERIFICATION

Laboratory ID:	WG115323-5	An	alysis	Lot: WG11530	7 Sample	Tag:		
	Ana	alyte	Units	Spiked	Measured	*Recovery	Limits	Analysis Date
	Lead.	TCLP	MG/L	2.0	2.0	100	90.0-110	01-Dec-05 06:13
Laboratory ID:	WG115323-7	An	alysis	Lot: WG11530	7 Sample	Tag:		
	Ana	alyte	Units	Spiked	Measured	Recovery	Limits	Analysis Date
				Spiked 2.0		-		Analysis Date 01-Dec-05 09:05
Laboratory ID:	Lead,	TCLP	MG/L	2.0	2.0	101		
Laboratory ID:	Lead, WG115323-9	TCLP	MG/L	2.0 Lot: WG11530	2.0 7 Sample	101 Tag:	90.0-110	

Page : 2 07-Dec-2005 10:12

PDC Laboratories, Inc.



ATTACHMENT 2 PHOTOGRAPHS





Photograph No. 1: View of the consolidated and treated material at the North Ditch Staging Area



Photograph No. 2: View of the consolidated and treated material at the North Ditch Staging Area



Photograph No. 3: View of the consolidated and treated material at the North Ditch Staging Area



Photograph No. 4: View of the loading of treated soils from the North Ditch Staging Area



Photograph No. 5: View of loading of treated soils from the North Ditch Staging Area

ATTACHMENT 3 DAILY WORK REPORTS



EN	ITACT S	ervices, LLC	Date	11/8	/2005	D	aily Proj	ect,Summa	гу
roject Name: roject Location:	Bartonville,	Keystone IL.				Customer: ENTACT Project	t#:	Keystone Wire & D-1154	Steel
				l. i		<u> </u>	Fairles		<u>.</u>
		ntact Personnel	. Uaves			escription	Equipm Mob Date		Hours
Name	Start Time 6:30 AM	Finish Time 5:30 PM	Hours 10.5	i l		escription estsu PC 300	7/12/2005	Demon Date	10
rent Hays aron McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005		0
and Hickory	0.307491	3.30 1 141	10.5		<u>`</u>	Cat D5	7/15/2005		10
		649 Personnel	<u> </u>		John	Deere 300D	7/18/2005	10/26/2005	0
like Staley	6:30 AM	5:30 PM	10.5			nlay Screen	7/19/2005	9/20/2005	0
ony Erickson	6:30 AM	5:30 PM	10.5			/olvo 240	7/25/2005		10
ames Stout	8:30 AM	5:30 PM	10.5		, ,	/olvo 240	8/2/2005		10
like High	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	8/22/2005		10
obby Chambers	6:30 AM	5:30 PM	10.5	4. 	Joh	n Deere 250	10/14/2005		0
en Walker	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	10/21/2005		10
				1					
		165 Personnel							
Nick Keagel	7:00 AM	5:30 PM	10	. '				<u> </u>	· · · · · · · · · · · · · · · · · · ·
eroy Richardson	7:00 AM	5:30 PM	10	لبسا	1, 1 1 1 1 1 1 1	· · · · · · · · · · · · · · · · · · ·	L	LL	
			QTY	Cum	ulative	Cumulative			
	Entaci	Progress	Today(est)		(est)	QTY(Verafied)	Pro	blem / Delays / (Changes
. Mobilization	· · · · · · · · · · · · · · · · · · ·		0.0%		0.0%	100.0%			
2. Site Setup			0.0%		0.0%	100.0%			
. Utility location			0.0%	100	0.0%	100.0%			
								er of the clearing w	
			1 1				the LSD is	stabilized and we c	
. Clear and grub	- L O4 - L III		0.0%		.0%	82.0%		side of the ditc	n
. Lower South Dit	ch Stadilize a	and Consolidate	1.0%	53	1.0%	0.0%			
Laura Cardo Dia	ah Uad Caada		0.00			440.00		d a. d . d different ac	
. Lower South Dite . South Ditch	on Hot Spots	· · · · · · · · · · · · · · · · · · ·	0.0%		0.0% '.0%	0.0%		d out additional tres	
. South Borrow W	lasta Dilo		0.0%		0.0%	0.0%	 - 	omplete treatment	UI 3U%
		Buffer tanks, Steam Line, Piping)	0.0%		2.0%	0.0%			
0. Stained Soil Ar		buller taliks, Steam Line, Fiping)	0.0%		.0%	0.0%	 		
1. Site Restoration		· · · · · · · · · · · · · · · · · · ·	0.0%		.0%	0.0%			
12. Demobilization		· · · · · · · · · · · · · · · · · · ·	0.0%		.0%	0.0%			
3. North Ditch Sta			1.0%		.0%	0.0%	State	out North Ditch St	aging Area
			QTY	Cum	ulative	Cumulative	T	blem / Delays / (
	Sub-Contra	actor Progress	Today(est)	QT	(est)	QTY(Verafied)	_ FIG	Diem / Delays / C	- manges
Relocate buffer tar	iks		0%		2%	0%		Installing pipin	9
<u> </u>			0%)%	0%			
			0%)%	0%	<u> </u>		
<u> </u>	Materi	al Delivery	l Wash	r Condit	<u> </u>	Other (2-4)	ha anulaman	t delivery and pl	abua baan
Deserved					80	Other (no	as equipmen	t denvery and pi	crub mara)
Descript	1011	Qty.	Temp.		alm	┥ ,			
			Precip			┪ `			
				A ST TELES	The state of the s	7			
]	1 No. 14 3	the state of the state of				
			4						
9 40 c		l	ka sagaraka	-3	1 1 1 1				
<u> </u>	ecription ~	Work Performed	ה י			••			
		Ditch stabilizing and consolidating Russ Perry staked out the North				en soil conditione	er. Stake out	North Ditch Sta	ging Area
			4				<u> </u>	· - ·	

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roject Name: roject Location: Name rent Hays	Parts villa II						aily Proj		
roject Location:	Davisas illa II	Keystone				Customer:		Keystone Wire	& Steel
Name	Benonville. IL	•				ENTACT Project	t #:	D-1154	
Name		The second secon	7.7	The state of the state of		,E,		. 	
		tact Personnel	1	18 M			Equipm	ent	
	Start Time	Finish Time	Hours		De	scription		Demob Date	Hours
	6:30 AM	5:30 PM	10.5	6 6		atsu PC 300	7/12/2005		10
aron McCorvey	6:30 AM	5:30 PM	10.5			at 950G	7/15/2005		0
ne Cronk	6:30 AM	5:30 PM	10.5			Cat D5	7/15/2005	-	10
		49 Personnel			John	Deere 300D	7/18/2005	10/26/2005	. 0
like Staley	6:30 AM	5:30 PM	10.5		Fin	ay Screen	7/19/2005	9/20/2005	0
ony Erickson	6:30 AM	5:30 PM	10.5		V	olvo 240	7/25/2005		10
mes Stout	6:30 AM	5:30 PM	10.5	1 L		olvo 240	8/2/2005		10
ike High	.6:30 AM	5:30 PM	10.5			Deere 250	8/22/2005	<u> </u>	10
obby Chambers	6:30 AM	5:30 PM	10.5			Deere 250	10/14/2005	L	0
n Walker	6:30 AM	5:30 PM	10.5		Johr	Deere 250	10/21/2005		10
	<u> </u>		<u> </u>					L 	<u></u>
		65 Personnel	, ,					 	·
Nick Keagel	7:00 AM	5:30 PM	10				<u></u>		
roy Richardson	7:00 AM	5:30 PM	10	L	1000	er person personal registration	and interpolation of the con-	192001 4 7 1 1 1 1 1 1 1	40. 17 (1.4
	<u> </u>		I QIY I	Cumula	tive	Cumulative		27 25 - 17 A	
	Entact F	Progress	Today(est)	QTY(e		QTY(Verafied)	Pro	blem / Delays /	Changes
Mobilization			0.0%	100.09		100.0%			
Site Setup			0.0%	100.09	ж.	100.0%			
Utility location			0.0%	100.09	Ж.	100.0%			
				_					will be completed as
Class and and			0.00		.	00.004	the LSD is		can get to the east
. Clear and grub Lower South Ditch Stabilize and Consolidate		1.0%	82.09 63.09		82.0% 0.0%		side of the dit	cn.	
LOWER SOURT DIK	ar Stabilize ar	O CONSONALE	1.070	65.03	•	0.070	<u> </u>		
Lower South Ditto	th Hot Snots		0.0%	110.09	.	110.0%	l nade	d out additional tre	lehetem heter
South Ditch	ar rioc opous		0.0%	57.09		0.0%		omplete treatmen	
South Borrow W	aste Pile		10.0%		120.0% 0.09			reating additional	
		ffer tanks, Steam Line, Piping)	0.0%	82.0%		0.0%			
D. Stained Soil An			0.0%	0.0%		0.0%			
1. Site Restoration	n		0.0%	0.0%		0.0%			
2. Demobilization			0.0%	0.0%		0.0%			
2 Marth Ditab Cta	-in- A		1 400	2.0%	1	0.007	Grap sample		of the 2002 sampl
3. North Ditch Sta	ying Area		1.0% QTY	Cumula		0.0% Cumulative		locations	
	Sub-Contrac	tor Progress	Today(est)	QTY(e		QTY(Verafied)	Pro	blem / Delays /	Changes
elocate Buffer tan		Wi Flogiess	0%	82%		0%	<u></u>	Installing pipi	
Division Denoi: East			0%	0%	-	0%		in ioutility paper	
			0%	0%	-	0%			
Lynn Vary as		The second secon		The second of the second of		and the second s	177 da. 18		الشراء المحيدة
	Material	Delivery	Weathe	r Condition	18	Other (not	e equipmen	t delivery and p	oickup here)
Descripti	OR	Qty.	Temp.	44					
			Wind	calm					
			Precip	<u> </u>	1 N/2 1				
			•						
			1		. J. N.				
			1 3 3 3 S	المراجعة ا ما مراجعة المراجعة ا					
<u> </u>		TATELON OF THE STREET, THE STR	7 5a						
		Nork Performed	in the ball of the		· 34			MON WAY	
		itch stabilizing and consolidatin Russ Perry staked out the Nor			o scree	n soil conditione	f. Stake out	North Ditch St	aging Area
		A CONTRACTOR OF THE	*						and programmed and a new programmed and
	Brent Hays								

EN	ITACT S	ervices, LLC	Date	12/2	/2005	D	aily Proj	ect Summa	ary	
Project Name: Project Location:	Bartonville,	Keystone IL.				Customer: ENTACT Project	t#:	Keystone Wire & Steel b. D-1154		
		-tt-B				*	Earles			
Name	Start Time	ntact Personnel Finish Time	Hours	i		escription	Equipm Mob Date		Hours	
Brent Hays	6:30 AM	5:30 PM	10.5			natsu PC 300	7/12/2005	Denion Date	10	
varon McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005		0	
oe Cronk	6:30 AM	5:30 PM	10.5			Cat D5	7/15/2005		10	
OC CICIAN		649 Personnel	1 1915		John	Deere 300D	7/18/2005	10/26/2005	0	
fike Staley	6:30 AM	5:30 PM	10.5		Fir	nlay Screen	7/19/2005	9/20/2005	. 0	
ony Erickson	6:30 AM	5:30 PM	10.5			Volvo 240	7/25/2005		10	
ames Stout	6:30 AM	5:30 PM	10.5			Volvo 240	8/2/2005		10	
/like High	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	8/22/2005		10	
Bobby Chambers	6:30 AM	5:30 PM	10.5			n Deere 250	10/14/2005		0	
(en Walker	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	10/21/2005		10	
			<u> </u>							
·		165 Personnel								
Nick Keagel	7:00 AM	5:30 PM	10	[1]			ļ			
eroy Richardson	7:00 AM	5:30 PM	10				() () () () () () () () () ()		rritation and .	
			i air	Curre	ulative	Cumulative	10 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m 1 m		4.4.4	
	Entact	Progress	Today(est)		((est)	QTY(Verafied)	Pro	blem / Delays /	Changes	
1. Mobilization			0.0%		0.0%	100.0%			· · · · · ·	
2. Site Setup	· · · · · ·		0.0%		0.0%	100.0%			*	
3. Utility location			0.0%		0.0%	100.0%				
Clear and grub Lower South Ditch Stabilize and Consolidate		0.0%		2.0% 82.0% 9.0% 0.0%		The remainder of the clearing will be completed the LSD is stabilized and we can get to the easide of the ditch.				
3. Lower South Dite	ch Hat Spate		0.0%	110	0.0%	110.0%	Loade	d out additional tre	eated material	
7. South Ditch	GI HOL OPOLA	·	0.0%		.0%	0.0%		impleted treatmer		
3. South Borrow W	aste Pile	111111111111111111111111111111111111111	0.0%		0.0%	0.0%		reating additional		
		Buffer tanks, Steam Line, Piping)	0.0%	82	.0%	0.0%				
10. Stained Soil An	68		0.0%	0.	0%	0.0%				
11. Site Restoration	n		0.0%	0.	0%	0.0%				
2. Demobilization			0.0%	0.	0%	0.0%				
13. North Ditch Sta	iging Area		1.0% QTY		0% ulative	0.0% Cumulative	each	sults from grab so of the 2002 samp blem / Delays /	ole locations	
		ctor Progress	Today(est)		(est)	QTY(Verafied)	710	Uleill / Delays /	Onanges	
Relocate Buffer tan	nks	·	0%		2%	0%		Installing pipi	ng	
			0%)%	0%				
			0%)%	0%	<u>L</u>			
	Materi	al Delivery	- Washa	τ Condit	ione	Othor (م مقررات	t delivery and p	Notrue born	
Descripti		Qty.	Temp.		21	Outer (110)	e equipmen	t usilvery and p	nexup nere/	
Descripti	КЛІ	Qiy.	Wind		alm	┪				
			Precip		snow	1				
			1			7				
			1							
			4							
 						 _				
<u> </u>	scription of	Work Performed	1		12	*	100			
ntact is in the Lo	ower South ind removes	Ditch stabilizing and consolidatin snow from retention basin. Enta out SBAWP material on Monday	ct receives po	st-exca	vation an	d post-treatment	sample resi	ults. All results	are within limit	
and Éntact will be	are <5 mg/l	TCLP lead.								
	12	TCLP lead.		<u>-</u>						

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Project Name: Keystone Customer: Keystone Wire & Stee Project Location: Bartonville, IL. ENTACT Project #: D-1154 Entact Personnel Equipment	Eì	NTACT S	ervices, LLC	Date	1/23/	2006	Daily Project Summary				
Name Start Time	Project Name:		Keystone				Customer:		Keystone Wire		
Start Time Finish Time Hours Finish Time Finish Finish Time Finish Time Finish	Project Location:		IF.	17	(- Promovi				. 30 C (200)	
Name	<u> </u>				ľľ	1 1 18 2 1					
Street Hoys 6:30 AM 5:30 PM 10.5	Nama			Hours		D	escription			Hours	
Narron McCorvey 6:30 AM		-			- - - - - - - - - - - - -					10	
Cat DS										0	
Gold Shreves	AUDIT INCCOLVEY	0.30 7.191	3.30 F.W	10.5	l 1					10	
Codd Shreves	~		649 Personnei	<u> </u>	l E	lohr				0	
Converticision S.30 AM S.30 PM 10.5 South District Stabilize and Consolidate Down South District Stabilize and Con	add Charren	6:20 AM		10.5	"					0	
Interest Stort				+						10	
James Schmitt 8:30 AM					l" "}					10	
Southy Chambers 6:30 AM 5:30 PM 10.5 John Deere 250 10/41/2005					-					10	
Cen Valler 6:30 AM 5:30 PM 10.5					100					0	
Doug Seare 6:30 AM 5:30 PM 10.5										10	
Signature Sign					-	Jon	in Deene 250	10/21/2005	 	10	
Nick Keåget 7:00 AM 5:30 PM 10		+			2 - 1 - 1 - 2 -			 	 		
Nick Kesgel 7:00 AM 5:30 PM 10	oug Beare	6:30 AM		10.5	do S			 	 		
Entact Progress Total Variable Cumulative QTY(verafied) Problem / Delays / Changest Cumulative QTY(verafied) Problem / Delays / Changest O.0% 100.0%		1 = 222 233	,	1	***			<u> </u>	 	<u> </u>	
Entact Progress Complete Com								ļ	 		
Entact Progress Today(est) OTY(est) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTY(Verafied) OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. OTHER LSD is stabilized and	eroy Richardson	1 7:00 AM				7000 - 19 H	N 2 60 V 1 7 7	<u> </u>	LL	11 / 1 U 1	
Mobilization 0.0% 100.0%	2							 	<u></u>		
Mobilization		Entact	Progress	1				Pro	blem / Delays /	Changes	
2. Site Setup 3. Utility location 3. Utility location 4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 5. Lower South Ditch Hot Spots 6. Clear South Ditch Hot Spots 7. South Ditch Hot Spots 8. Lower South Ditch Hot Spots 8. Lower South Ditch Hot Spots 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 10. Ow% 10	1 Mobilization	• • •	·					 	 		
3. Utility location 10.0% 100.0% 100.0% 100.0% 100.0% The remainder of the clearing will be on the LSD is stabilized and we can get side of the ditch. 10.0% 82.0% 82.0% 10.0% 110.0% 110.0% 110.0% 110.0% 10.0				•			+	†			
4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Clear and grub 7. South Ditch Stabilize and Consolidate 7. South Ditch Hot Spots 8. Lower South Ditch Hot Spots 9. O.0% 9. 110.0% 9. 110.0% 9. 110.0% 9. 0.0%			· · · · · · · · · · · · · · · · · · ·					 			
8. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 7. South Ditch Hot Spots 8. Lower South Ditch Hot Spots 9. On% 110.0% 110.0% Loaded out additional treated me one of the ditch of the d	J. Ching Rocation			0.070	700	.0 70	100.0%				
5. Lower South Ditch Stabilize and Consolidate 9.0% 82.2% 0.0% 110.0% Loaded out additional treated m 7. South Ditch Hot Spots 9.0% 65.0% 0.0% 9.0% 10.0% 0.0% 9.0% 100.0% 0.0% 10.5 Stained Soil Area 10.0% 0.0% 0.0% 10.0% 0.0%	Clear and anih			0.004	02	noc	92.094	the LSD is			
8. Lower South Ditch Hot Spots 0.0% 110.0% 0.0% 0.0% 10.0% 1.00% 0.0% Treating additional trested m 0.0% 65.0% 0.0% 1.00% 0.0% 1.00% 0.0% 1.00.0% 0.0%		ch Stabiliza	and Consolidate					 	SAGE OF URE UNIX	41.	
7. South Ditch 8. South Borrow. Waste Pile 9. O.0% 1. Stained Soil Area 10. Stained Soil Area 10. O.0% 10. Stained Soil Area 10. O.0% 10. Stained Soil Area 10. O.0%	D. LOWER SOURT DIE	GI SIADIIIZE E	and Consolidate	0.076	02.	270	0.078		•		
7. South Ditch 8. South Borrow. Waste Pile 9. O.0% 1. Stained Soil Area 10. Stained Soil Area 10. O.0% 10. Stained Soil Area 10. O.0% 10. Stained Soil Area 10. O.0%	R Lawer Courth Dit	ah Hat Caata		0.004	140	004	110.00	Landa	مدة المحملة المحمد عدم الم	ntod motorial	
8. South Borrow Waste Pile		at not Spots						Loadie	a out additional ire	ated material	
P. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 10.0% 10		leete Pile						 			
10. Stained Soil Area			Preffer tanks Steam Line Diging)		_			<u> </u>	realing additional	I Halles Jau	
11. Site Restoration			buller tariks, Steam Line, Piping)					 			
12. Demobilitzation 13. North Ditch Staging Area 14. Own Sub-Contractor Progress 15. Own Sub-Contractor Progress 16. Own Sub-Contractor Progress 17. Own Sub-Contractor Progress 18. Own Sub-Contractor Progress 19. Own Sub-C							• • • • • • • • • • • • • • • • • • • 	 			
13. North Ditch Staging Area 2.0% 5.0% 0.0% In-situ treatment with TSP QTY Cumulative QTY(Verafled) Problem / Delays / Chang Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0					_			 	· · · · · · · · · · · · · · · · · · ·		
Sub-Contractor Progress Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0								 	L14. 44 4	III. TOD	
Sub-Contractor Progress Today(est) QTY(est) QTY(Verafied) Problem / Delays / Change Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%	13. NOTUI DROTT SIZ	iging Area	· · · · · · · · · · · · · · · · · · ·					 	m-situ treatiment wi	m 15P	
Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%		Sub Contr	netor Drogmon	1				Pro	blem / Delays /	Changes	
Material Delivery Weather Conditions Other (note equipment delivery and pickup	Polocoto Puffor to		ictor Progress				, , , , , , , , , , , , , , , , , , , 	 	 		
Material Delivery Weather Conditions Other (note equipment delivery and pickup Description Otty. Temp. 29 Wind calm Precip T/snow Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.	Telocale buller lai	IKS.	·		_		• • • • • • • • • • • • • • • • • • • 	 	 		
Material Delivery Weather Conditions Other (note equipment delivery and pickup Description Otty. Temp. 29 Wind calm Precip T/snow Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.								 			
Material Delivery Description Otty. Temp. 29 Wind calm Precip T/snow Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.			a transfer of the second	(070	L			!			
Description Qty. Temp. 29 Wind calm Precip T/snow Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.				Weathe	r Conditi	ons					
Wind calm Precip T/snow Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.	Descript		,, , , , , , , , , , , , , , , , , , ,								
Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.						-	1				
Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.							1				
Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.				* .			7				
Description of Work Performed Intact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.]		1.50	4				
Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.				15000	30 M T	1 2 T	1				
Description of Work Performed Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time.				<u>l</u> ø	<u> </u>		4	1910 19 13 1 W Head		And the second s	
Entact is Pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later tim	<u>مأسيدا ديمو دي.</u>			1.0	4.		ties in the solid	. 1.07	at the second		
	Entact is Pumpin	g water out	of LSD. Entact is screening soil								
Completed By: Brent Hays				STATUTUS TOUS	of the second	William I	227 1427 7 27 27 27	a, en mana ma	Land da de aeroa Rada		

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EN	ITACT S	ervices, LLC	Date	1/24/	2006	Daily Project Summary				
Project Name: Project Location:	Bartonville,	Keystone IL.				Customer: ENTACT Projec	t#:	Keystone Wire & D-1154	& Steel	
A. A		3 7 5 m	7	JAR TON	(1,075), V					
		ntact Personnel					Equipm			
Name	Start Time	Finish Time	Hours			scription		Demob Date	Hours	
Brent Hays	6:30 AM	5:30 PM	10.5			atsu PC 300	7/12/2005		10	
Aaron McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005		0	
			L			Cat D5	7/15/2005		10	
	···	649 Personnel				Deere 300D	7/18/2005		0	
Todd Shreves	6:30 AM	5:30 PM	10.5	1		lay Screen	7/19/2005	9/20/2005	0	
Tony Erickson	6:30 AM	5:30 PM	10.5			/olvo 240	7/25/2005		10	
James Stout	6:30 AM	5:30 PM	10.5			/olvo 240	8/2/2005		10	
James Schmitt	6:30 AM	5:30 PM	10.5	-		n Deere 250	8/22/2005		10	
Bobby Chambers	6:30 AM	5:30 PM	10.5			n Deere 250	10/14/2005		0	
Ken Walker	6:30 AM	5:30 PM	10.5	 	Joni	n Deere 250	10/21/2005		10	
Doug Graff	6:30 AM	5:30 PM	10.5	-						
Doug Beare	6:30 AM	5:30 PM	10.5	1			 			
Niel-Kassel	7.00 444	165 Personnel	1 40	1						
Nick Keagel	7:00 AM	5:30 PM	10			 		 		
Leroy Richardson	7:00 AM	5:30 PM	10				<u>. </u>	L <u>.</u>		
	<u> </u>		QIY	Cumu		Cumulative	<u></u>	<u> </u>		
	Entact	Progress	Today(est)	QTY		QTY(Verafied)	Pro	biem / Delays /	Changes	
1. Mobilization			0.0%	100		100.0%	-		•	
2. Site Setup		· · · · · · · · · · · · · · · · · · ·	0.0%	100		100.0%			···	
3. Utility location			0.0%	100		100.0%				
								er of the clearing wastabilized and we o	an get to the ea	
4. Clear and grub			0.0%	82.		82.0%		side of the dito	<u></u>	
5. Lower South Dite	on Stabilize a	ind Consolidate	0.0%	82.	2%	0.0%			<u>-</u>	
6. Lower South Dite	th Hat Saata		0.0%	110	004	110.0%	Landa	d out additional tre	atad matarial	
7. South Ditch	aj Hot opola	· · · · · ·	3.0%	68.		0.0%	LUGUG	O COLL SCICILIONIST D.C.	attorn il totto i lati	
8. South Borrow W	este Pile		0.0%	140		0.0%		reating additional r	notorial	
		Buffer tanks, Steam Line, Piping)	0.0%	100		0.0%		Today Garagora	TAGO IGA	
10. Stained Soil An		Janes and, Janes and, I spring)	0.0%	100		0.0%				
11 Site Restoration			0.0%	0.0		0.0%		• •	•	
12. Demobilization			0.0%	0.0		0.0%			· · · · ·	
13. North Ditch Sta			3.0%	8.0		0.0%		n-situ treatment wi	th TSP	
			QTY	Cumu		Cumulative				
	Sub-Contra	ctor Progress	Today(est)	QTY		QTY(Verafied)	Pro	blem / Delays /	Changes	
Relocate Buffer tan			0%	100		0%				
			0%	O		0%				
		· · · · · · · · · · · · · · · · · · ·	0%	O O		0%				
	* 7 * * * * * * * * *	Fig. 1 - Carlotte Control of the Con	•			A		* * 1 * *		
	Materia	al Delivery	Weathe	r Conditi	ons	Other (not	e equipmen	t delivery and p	ickup here)	
Descripti	on	Qty.	Temp.	3	7					
TSP		25 tons	Wind	ca]				
			Precip	T/sı	OW					
			- '	.,	7.77.75	1				
			-		18	1				
· · ·	·· ·		1			1				
·			<u> </u>			·	· · · · · · · · · · · · · · · · · · ·	 ·		
Der	scription of	Work Performed	1				v.			
		f LSD. Entact is screening soil material in NDSA with TSP.	conditioner an	nd hauling	it to the	roll off box yard	to stockpile	for use at a late	er time. Entac	
	·····	· · · · · · · · · · · · · · · · · · ·								
Completed By: E		A CONTRACTOR OF THE CONTRACTOR						<u> </u>		

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Eλ	ITACT S	ervices, LLC	Date	1/25/	2006	D	aily Proj	ect Summa	ry
roject Name: roject Location:	Bartonville,					Customer: ENTACT Project	#:	Keystone Wire & D-1154	Steel
			·	r		·	Familian		
Name	Start Time	intact Personnel Finish Time	Hours	-	n.	escription	Equipm Mob Date	Demob Date	Hours
rent Hays	6:30 AM	5:30 PM	10.5			atsu PC 300	7/12/2005	Detinob Date	10
aron McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005	· · · · · · · · · · · · · · · · · · ·	0
-						Cat D5	7/15/2005		10
		649 Personnel				Deere 300D	7/18/2005	10/26/2005	. 0
odd Shreves	6:30 AM	5:30 PM	10.5			lay Screen	7/19/2005	9/20/2005	0
ony Enckson	6:30 AM	5:30 PM	10.5			/olvo 240	7/25/2005		10
ames Stout	6:30 AM	5:30 PM	10.5	- 1		olvo 240 n Deere 250	8/2/2005		10 10
ames Schmitt obby Chambers	6:30 AM 6:30 AM	5:30 PM 5:30 PM	10.5 10.5			n Deere 250	8/22/2005 10/14/2005		0
en Walker	6:30 AM	5:30 PM	10.5	·		n Deere 250	10/21/2005		10
oug Graff	6:30 AM	5:30 PM	10.5	·	301	1 000:0 200	10/21/2005	 	
oug Beare	6:30 AM	5:30 PM	10.5					-	
	1 0.00711.	165 Personnel	1919	. *					
Nick Keagel	7:00 AM	5:30 PM	10	_ F				· ·	
eroy Richardson	7:00 AM	5:30 PM	10						
			T 800		ialia.				
	Entact	Progress	QTY	Cumu		Cumulative	Pro	blem / Delays / (Changes
Mobilization			Today(est) 0.0%	QTY:		QTY(Verafied) 100.0%			
. Site Setup			0.0%	100		100.0%	· · · · · · ·		
. Utility location			0.0%	100		100.0%			
. Culty location		···	0.0%	100	0.70	100.0%	The remaind	er of the clearing w	ill be completed
			1					stabilized and we c	an get to the ea
Clear and grub Lower South Ditch Stabilize and Consolidate		0.0%	82.		82.0%		side of the ditc	<u>h </u>	
. Lower South Dit	ch Stabilize	and Consolidate	0.1%	82.	3%	0.0%			
1 0 45- 04-	-1-10-40-4-					l			
. Lower South Dit . South Ditch	on Hot Spots	<u> </u>	0.0% 3.0%	110 71.		110.0% 0.0%	Loade	d out additional trea	ited material
. South Borrow W	leste Pile		0.0%	140		0.0%		reating additional n	ngterial
		Buffer tanks, Steam Line, Piping)	0.0%	100			<u>'</u>	Teaming commontain	IBIEI KEI
0. Stained Soil Ar			0.0%	100		0.0%			
1. Site Restoratio	n		0.0%	0.0	%	0.0%			
2. Demobilization			0.0%	0.0	96	0.0%			
3. North Ditch Sta	iging Area		1.0%	9.0		0.0%	Col	lect characterization	samples
			QTY	Cumu		Cumulative	Pro	blem / Delays / (Changes
· · · · · · · · · · · · · · · · · · ·		ector Progress	Today(est)	QTY		QTY(Verafied)			
lelocate Buffer tar	rks		0%	100		0%			
			0%	0,		0%			
· · · · · · · · · · · · · · · · · · ·			1 040	<u> </u>	<u>, , , , , , , , , , , , , , , , , , , </u>	1 0%		·········	
	Materi	al Delivery	Weathe	r Condition	ons	Other (not	e equipmen	t delivery and pl	ckup here)
Descripti		Qty.	Temp.	3					<u></u>
			Wind	ca	m	1			
			Precip	T/sr	OW]			
	 -		A CONTRACTOR OF THE CONTRACTOR	4					
					100	!			
			1		- 1/5	ļ			
		gradien de la plus de				· · · · · · · · · · · · · · · · · · ·			
Des	scription of	Work Performed		12.25					
	ization sam	of LSD. Entact is screening soil of ples in NDSA and send to PDC In LSD again.							
			The second of the		:		Latinary Es	st	
amalatad Buil	Brent Hays								
onipieuru by.		, , , , , , , , , , , , , , , , , , , 							en, vist ===

Project Name: Project Location: Name Brent Hays Naron McCorvey Fodd Shreves Fony Erickson Names Stout	Start Time 6:30 AM					Customer:		Keystone Wire	Steel
odd Shreves ony Erickson	Start Time 6:30 AM					ENTACT Project		D-1154	
odd Shreves ony Erickson	Start Time 6:30 AM				<u>i </u>	- 	1.50		
rent Hays aron McCorvey odd Shreves ony Erickson arnes Stout	6:30 AM	tact Personnel Finish Time	Hours	<u> </u>			Equipm		Uzuzz
odd Shreves ony Erickson		5:30 PM	*********	-		escription	7/12/2005	Demob Date	Hours
odd Shreves ony Erickson ames Stout	ELA ACIA	5:30 PM	10.5	. -		natsu PC 300	7/12/2005		10 0
ony Erickson ames Stout	6:30 AM	5:30 PM	10.5			Cat 950G Cat D5	7/15/2005		10
ony Erickson ames Stout	<u>'</u> -	49 Personnel	'	·	lobr	Deere 300D	7/18/2005	10/26/2005	0
ony Erickson ames Stout	6:30 AM	5:30 PM	10.5	· }		nlay Screen	7/19/2005	9/20/2005	0
ames Stout	6:30 AM	5:30 PM	10.5	· .H		/olvo 240	7/25/2005	- 8/20/2003	10
	6:30 AM	5:30 PM	10.5	- 1		/olvo 240	8/2/2005	+	10.
ames Schmitt	6:30 AM	5:30 PM	10.5	·		n Deere 250	8/22/2005		10
obby Chambers	6:30 AM	5:30 PM	10.5	, F		n Deere 250	10/14/2005		0
en Walker	6:30 AM	5:30 PM	10.5			n Deere 250	10/21/2005		10
oug Graff	6:30 AM	5:30 PM	10.5						
oug Beare	6:30 AM	5:30 PM	10.5						
		65 Personnel		·		•			
Nick Keagel	7:00 AM	5:30 PM	10						
eroy Richardson	7:00 AM	5:30 PM	10						
i i i i i i i i i i i i i i i i i i i	7.56741 1	A STATE OF THE STA	g **				· -		
	Entact P	maree	QTY	Cumu	ative	Cumulative	D-m	blem / Delays /	Channe
			Today(est)	QTY(QTY(Verafied)	Più	Dictil / Delays /	CitatiAes
. Mobilization			0.0%	100.		100.0%			
. Site Setup	 		0.0%	100.		100.0%			
Utility location	-		0.0%	100.	0%	100.0%			
			1					er of the cleaning w	
. Clear and grub			0.0%	82.0	19£	82.0%	the LSD is stabilized and we can get to the ex side of the ditch.		
Lower South Ditio	h Stahilize an	d Consolidate	0.1%	82.5		0.0%		aue or the diff	41
. LOWER GOODS DIE	TO COLONIEC CIT	a conconduct	 ••••	02.0	, , , , , , , , , , , , , , , , , , ,	0.0%			
. Lower South Ditc	h Hot Soots		0.0%	110.	N94.	110.0%	Londor	d out additional tre	ated material
South Ditch	птогоров	······	3.0%	77.0		0.0%	Locato	o out additional tre	aled menterial
South Borrow Wa	aste Pile		0.0%	140.		0.0%	Treating additional material		natorial
		ffer tanks, Steam Line, Piping)	0.0%	100.		0.0%	·	reciently decisionize	1821019421
0. Stained Soil Are			0.0%	100.		0.0%			
1. Site Restoration			0.0%	0.0		0.0%	-		
2. Demobilization			0.0%	0.0		0.0%			····
3. North ditch stag	ino area		1.0%	10.0		0.0%		treatment sample eet disposal requir	
			QTY	Cumu	lative	Cumulative			
	Sub-Contrac	tor Progress	Today(est)	QTY(est)	QTY(Verafied)	Pro	blem / Delays /	Changes
elocate Buffer tan	ks		0%	100	96	0%			_
			0%	09	6	0%			
			0%	09	6	0%	_		
	1.12, 7	The state of the s					tag =		
	Material		Weather	r Conditio	ns	Other (not	e equipmen	t delivery and p	ickup here)
Description	òn	Qty.	Тетр.	44					
			Wind	cal]			
			Precip	T/sn	OW	4			
			1						
			1	,					
			1			-			
and the mark of the same	ar an an an an an an	A. J. Jr. 1841 A	Σ			· 6	114777	· · · · · · · · · · · · · · · · · · ·	7. 47. 7.
Des	cription of V	Vork Performed							
	ing to PDC fo	LSD and the S. Ditch. Entact in disposal. Continue stabilizing ments.							
	i di T	A Section of the second of the	NACE AND THE		7 77		The second	# 0 1.1% (A)1 15A	্ প্রক্রি
ompleted By: B									

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EN	ITACT S	Services, LLC	Date	1/30/	2006	Daily Project Summary				
roject Name: roject Location:	Bartonville,	Keystone IL.				Customer: ENTACT Project		Keystone Wire D-1154		
		Intact Personnel		Ė			Equipm			
			T - 13	- 1						
Name	Start Time		Hours	·		escription		Demob Date	Hours	
rent Hays	6:30 AM	5:30 PM	10.5	-		natsu PC 300	7/12/2005		10	
aron McCorvey	6:30 AM	5:30 PM	10.5	-		Cat 950G	7/15/2005		0	
			1			Cat D5	7/15/2005		10	
· · · · · · · · · · · · · · · · · · ·		649 Personnel		L		n Deere 300D	7/18/2005	10/26/2005	0	
odd Shreves	6:30 AM	5:30 PM	10.5	L		nlay Screen	7/19/2005	9/20/2005	0	
ony Erickson	6:30 AM	5:30 PM	10.5	· L		Valvo 240	7/25/2005		10	
ames Stout	6:30 AM	5:30 PM	10.5			Valva 240	8/2/2005		10	
ames Schmitt	6:30 AM	5:30 PM	10.5	` '* <u>{</u>	Joh	n Deere 250	8/22/2005		10	
lobby Chambers	6:30 AM	5:30 PM	10.5	L	Joh	n Deere 250	10/14/2005		0	
en Walker	6:30 AM	5:30 PM	10.5	1 1 1 1 1 1 L	Joh	n Deere 250	10/21/2005		10	
oug Graff	6:30 AM	5:30 PM	10.5	. [
Ooug Beare	6:30 AM	5:30 PM	10.5							
		165 Personnel								
Nick Keagel	7:00 AM	5:30 PM	10	, r						
eroy Richardson	7:00 AM	5:30 PM	10							
							<u> </u>			
	Entaci	t Progress	QTY	Cumu		Cumulative	Pm	blem / Delays /	Changes	
<u> </u>			Today(est)	QTY		QTY(Verafied)		Dickin / Delays /		
. Mobilization			0.0%	100		100.0%				
2. Site Setup			0.0%	100		100.0%	ļ			
. Utility location			0.0%	100	.0%	100.0%				
			1 1						will be completed a	
Close and each			000	00	~~	92.00	the LSD is:		can get to the east	
Clear and grub Lower South Ditc	-b Ctobili-ro	and Canadidate	0.0%	82.		82.0% 0.0%	ļ	side of the dit	<u>uı </u>	
. LOWER SOURT DIRE	A) SWUIIZE	and Consultate	0.170	82.	076	0.0%	 -	······································		
		_				1				
Lower South Ditc	an Hot Spots	3 <u> </u>	0.0%	110		110.0%	Loade	d out additional tre	sated material	
. South Ditch	- to Dile		3.0%	80.		0.0%				
South Borrow Wa		Deffectable Charactics District	0.0%	140		0.0%	1 1	reating additional	matenal	
		Buffer tanks, Steam Line, Piping)	0.0%	100		0.0%	 			
10. Stained Soil Are			0.0%	100		0.0%				
1 Site Restoration			0.0%	0.0		0.0%				
2. Demobilization			0.0%	0.0	1%	0.0%				
							Begin loading		azwell County RD	
North ditch stag	jing area		5.0%	15.		0.0%		for disposa	<u> </u>	
			QTY	Cumu		Cumulative	Pro	blem / Delays /	Changes	
		actor Progress	Today(est)	QTY		QTY(Verafied)				
Relocate Buffer tan	iks		0%	100		0%	ļ		• • • • • • • • • • • • • • • • • • • •	
			0%	0		0%				
			0%	0	ж	0%	L			
w 11 3 3	Beatani	al Delivery	T Wastes	r Condition		T Other (not	<u>, , , , , , , , , , , , , , , , , , , </u>	A dellares and e	dalaria baira	
Birrital			+			Other (note equipment delivery and pickup h			ickup nere)	
Description	on	Qty.	Temp. Wind	3 ca		4				
-			Precip		TOW	┪				
			T TOOLD	1/34	IOW	₹				
			1	:	. 1.	1				
			1	* + 1 .	. 15 1.	"				
			<u></u>			<u></u>		-		
		· \$1.50 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)		6.	5 ed.		Park the second	y Tariff & Joseph	4	
Doc		Work Performed	<u></u>							
		of LSD and the S. Ditch. Entact for disposal. Continue stabilizing								
ntact is pumping	•									
Entact is pumping naterial and send County RDF for di	isposal.			· · · · · · · · · · · · · · · · · · ·			A TAY THE			
ntact is pumping naterial and send	isposal.				3.4		<u> </u>		- Charles - Carlotte -	

	TACT S	ervices, LLC	Date	1/31	/2006	D	Daily Project Summary				
Project Name: Project Location:	Rartonville	Keystone				Customer: ENTACT Project	+	Keystone Wire & Steel D-1154			
Topour Location.	- I VIIIO,	II				ENTAGE FIGURE	*	<u> </u>			
 	Е	intact Personnel					Equipm	ent			
Name	Start Time	Finish Time	Hours		0	escription	Mob Date	Demob Date	Hours		
Brent Hays	6:30 AM	5:30 PM	10.5			natsu PC 300	7/12/2005		10		
Aaron McCorvey	6:30 AM	5:30 PM	10.5	4		Cat 950G	7/15/2005		<u>0</u> 10		
		649 Personnel			Joh	Cat D5 Deere 300D	7/15/2005 7/18/2005	10/26/2005	0		
Todd Shreves	6:30 AM	5:30 PM	10.5			nlay Screen	7/19/2005	9/20/2005	ō		
Fony Erickson			10.5			Volvo 240	7/25/2005		10		
James Stout	6:30 AM	5:30 PM	10.5			Volvo 240	8/2/2005		10		
James Schmitt Bobby Chambers	6:30 AM 6:30 AM	5:30 PM 5:30 PM	10.5 10.5			n Deere 250 n Deere 250	8/22/2005 10/14/2005		10		
Ken Walker	6:30 AM	5:30 PM	10.5			n Deere 250	10/21/2005	 	10		
Doug Graff	6:30 AM	5:30 PM	10.5	ı							
Doug Beare	6:30 AM	5:30 PM	10.5								
Aliah IZ	7:00 AM	165 Personnel 5:30 PM			ļ						
Nick Keagel Leroy Richardson	7:00 AM 7:00 AM	5:30 PM 5:30 PM	10	· -							
Cercy (Clarent Cook)			A	7	4444	1 h	de la companya de la				
	Entact	Progress	QTY Today(est)		ulative ((est)	Cumulative QTY(Verafied)	Pro	blem / Delays /	Changes		
I. Mobilization			0.0%		0.0%	100.0%					
2. Site Setup			0.0%	_	0.0%	100.0%					
3. Utility location			0.0%	10	0.0%	100.0%					
			1 1						vill be completed a can get to the east		
4. Clear and grub	0.0%	82	2.0%	82.0%	110 200 10	side of the dita					
5. Lower South Ditcl	h Stabilize a	ind Consolidate	0.1%	82	2.7%	0.0%					
P. Laures Careth Dita	h Hat Casta		0.00	44	0.004	440.00	1				
 Lower South Ditch South Ditch 	ii not Spots		0.0% 3.0%		0.0% 3.0%	110.0%	Loade	d out additional tre	eted material		
8. South Borrow Wa			0.0%		0.0%	0.0%	Ť	reating additional	material		
		Buffer tanks, Steam Line, Piping)	0.0%	10	0.0%	0.0%					
10. Stained Soil Are			0.0%		0.0%	0.0%					
11. Site Restoration 12. Demobilization			0.0%		.0%	0.0%			· · · · · · · · · · · · · · · · · · ·		
12. Demodipation			1 0.0%		.076	0.0%	Continue lo	ading out material	to Tazwell County		
13. North ditch stagi	ing area		5.0%	20	0.0%	0.0%	Continue	RDF for dispos			
			QTY	Cumulative		Cumulative	Problem / Delays		Changes		
		ctor Progress	Today(est)		r(est)	QTY(Verafied)					
Relocate Buffer tank	ND		0%)%)%	0%					
			0%		0%	0%					
See a see a see a see a see see see		But San Day Comment							<u> </u>		
Description		al Delivery Qty.	Temp.	r Condit	ions 35	Other (note equipment delivery and pickup here)					
Description	-	ary.	Wind		aim	1					
			Precip			1					
		 	4								
			1								
10 5:]:	<u></u>	<u></u>	<u> </u>		,,			
<u>Noe</u>	cription of	Work Performed	7 · · · · ·		٠, ,		****		The Age to A		
intact is pumping	water out o	f LSD and the S. Ditch. Entact i for disposal. Continue stabilizin	s screening so g and consolid	oil condi dating th	tioner an e LSD.	d hauling it to the Entact continues	LSD. Entailoading out	ct is loading ou NDSA and send	t S. Ditch ding to Tazwell		

EN	ITACT S	ervices, LLC	Date	2/1/	2006	D	aily Proj	ect Summa	ary
Project Name: Project Location:	Bartonville,	Keystone IL.			************************	Customer: ENTACT Project	t#:	Keystone Wire D-1154	& Steel
	<u> </u>	intact Personnel				· · · · · · · · · · · · · · · · · · ·	Earlan		
Name	Start Time	Finish Time	Hours			escription	Equipm Mob Date	Demob Date	Hours
Brent Havs	6:30 AM	5:30 PM	10.5			atsu PC 300	7/12/2005	Demos Daw	10
Aaron McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005		0
Tall of Hiccolvey	0.00744	3.35116	10.0			Cat D5	7/15/2005	 	10
	<u> </u>	649 Personnei	•		John	Deere 300D	7/18/2005		0
Todd Shreves	6:30 AM	5:30 PM	10.5			lay Screen	7/19/2005	9/20/2005	0
Tony Erickson	6:30 AM	5:30 PM	10.5	-		/olvo 240	7/25/2005		10
James Stout	6:30 AM	5:30 PM	10.5			/olvo 240	8/2/2005		10
James Schmitt	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	8/22/2005		10
Bobby Chambers	6:30 AM	5:30 PM	10.5		Joh	n Deere 250	10/14/2005		0
Ken Walker	6:30 AM	5:30 PM	10.5	: :-	Joh	n Deere 250	10/21/2005		10
Doug Graff	6:30 AM	5:30 PM	10.5	i i					
Doug Beare	6:30 AM	5:30 PM	10.5	, 1					
		165 Personnel		i i					
Nick Keagel	7:00 AM	5:30 PM	10						
Leroy Richardson	7:00 AM	5:30 PM	10						
		and the second of the second of the second							
	Entact	Progress	QTY		ulative	Cumulative	Pro	blem / Delays /	Changes
1. Mobilization			Today(est) 0.0%		((est) 0.0%	QTY(Verafied) 100.0%	 		
2. Site Setup			0.0%		0.0%	100.0%	 		
3. Utility location			0.0%		0.0%	100.0%	 		
. Clear and grub			0.0%	82	1.0%	82.0%	The remainder of the clearing will be completed the LSD is stabilized and we can get to the ea- side of the ditch.		
5. Lower South Dit	ch Stabilize a	and Consolidate	0.1%	82	.8%	0.0%			
6. Lower South Dit	ch Hot Spots		0.0%	110	0.0%	110.0%	Loade	d out additional tr	sated material .
7. South Ditch			3.0%	86	.0%	0.0%			-
B. South Borrow W	aste Pile		0.0%	14	0.0%	0.0%	Т	reating additional	material
		Buffer tanks, Steam Line, Piping)	0.0%	10	0.0%	0.0%			
10. Stained Soil Ar			0.0%	10	0.0%	0.0%	L		
11. Site Restoratio			0.0%		.0%	0.0%			
12. Demobilization		·· ·· · · · · · · · · · · · · · · ·	0.0%	0	.0%	0.0%			·
			l				Continue to	ading out material	
13. North ditch sta	ging area		5.0%		.0%	0.0%		RDF for dispo	sal.
	0.1.0		QTY		ulative	Cumulative	Pro	blem / Delays /	Changes
D-1-1-1- D #		ictor Progress	Today(est)		(est)	QTY(Verafied)	ļ		
Relocate Buffer tar	IKS		0%)0%)%	0%	 -		
·			0%		796 196	0%			
	 	the Control of the Control	1 070			1 0%			-
	Materia	al Delivery	Weathe	r Condit		Other (not	e equipmen	t delivery and p	dekun here)
Descript		Qty.	Temp.		38		o oquipinon	Coursely und	monap more,
			Wind		alm	1			
			Precip			1			
					. :	1			
					100				
			-			1			
Av	 					<u>L </u>		 ,	
Pa	scription of	Work Performed	1						
Entact is pumping material and send Tazwell County R	ling to PDC	of LSD and the S. Ditch. Entact in for disposal. Continue stabilizing posal.	s screening so g and consolic	oil condi dating th	tioner and le LSD. E	d hauling it to the Entact continues	LSD. Enta loading out	ct is loading ou NDSA and sen	t S. Ditch ding material
Completed By:	Input Have	- A	14 5		- 11 - 11 - 12 - 14 - 14 - 14 - 14 - 14		130 . 11 . 1	<u> </u>	from Assistantes
Completed By: I	rent Hays			77 L			<u> </u>		As a comment

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EN	ITACT S	ervices, LLC	Date	2/2/	2006	D	aily Proj	ect Summa	агу
roject Name: roject Location:		Keystone				Customer: ENTACT Project		Keystone Wire D-1154	
edition of the second s			· · · · · · · · · · · · · · · · · · ·	·······		7 7			
		ntact Personnel	Y				Equipm		
Name	Start Time	Finish Time	Hours			escription	Mob Date	Demob Date	Hours
rent Hays	6:30 AM	5:30 PM	10.5			atsu PC 300	7/12/2005		10
aron McCorvey	6:30 AM	5:30 PM	10.5		•	Cat 950G	7/15/2005		0
		649 Personnel	L		l-b-	Cat D5	7/15/2005	40000000	10
and Objectives			1 40 5	. 1		Deere 300D	7/18/2005		0
odd Shreves	6:30 AM	5:30 PM	10.5			nlay Screen	7/19/2005	9/20/2005	0
ony Erickson ames Stout	6:30 AM 6:30 AM	5:30 PM 5:30 PM	10.5 10.5	. 4		/olvo 240	7/25/2005	1	10
ames Schmitt	6:30 AM	5:30 PM	10.5	14		/olvo 240 n Deere 250	8/2/2005 8/22/2005		10
Bobby Chambers	6:30 AM	5:30 PM	10.5			n Deere 250	10/14/2005		0
en Walker	6:30 AM	5:30 PM	10.5	3.74		n Deere 250 n Deere 250	10/14/2005	+	10.
Coup Graff	6:30 AM	5:30 PM	10.5	'	Joh	<i>ப</i> சை18 230	10/21/2005	 	10,
Oug Beare	6:30 AM	5:30 PM	10.5			-	 	 	
July Deale	U.UU /UII	165 Personnel	1 10.5				 	 	
Nick Keagel	7:00 AM	5:30 PM	10	* /				 	_
eroy Richardson	7:00 AM	5:30 PM	10	. 1	 		 	 	
CONTRACTOR	1.00 Mil	3.30 F IA	10	L					
	Fudual		QTY	Cum	ulative	Cumulative			-
	Entact	Progress	Today(est)	QTY	(est)	QTY(Verafied)	Pro	blem / Delays /	Changes
. Mobilization			0.0%	100	0.0%	100.0%			
2. Site Setup			0.0%	100).0%	100.0%			
. Utility location			0.0%	100	0.0%	100.0%			
								er of the clearing v	
Class and and							the LSD is	stabilized and we	
Clear and grub Lower South Dits	er Oughillian		0.0%		.0%	82.0%		side of the dit	ch.
. Lower South Dit	ai Stabilize a	ind Consolidate	0.1%	82	.9%	0.0%			
Laure Caudh Dir	ah Hat Caata		1			440.004			
3. Lower South Dite 7. South Ditch	an mot Spots		1.0%).0% .0%	110.0% 0.0%	Loade	d out additional tre	eated material
B. South Borrow W	seta Dila		0.0%		0.0%	0.0%	ļ		
		Suffer tanks, Steam Line, Piping)	0.0%		0.0%	0.0%		reating additional	mercented
10. Stained Soil An		ouner tariks, Oteatri Line, Fipring/	0.0%		0.0%	0.0%	 		
1. Site Restoration			0.0%		0%	0.0%		 	
2. Demobilization	•	· · · · · · · · · · · · · · · · · · ·	0.0%		0%	0.0%	-		
3. North ditch stag	ning age		5.0%		.0%	0.0%	Collect post-	excavation confirmation send to PDC I	
	, , , , , , , , , , , , , , , , , , ,		QTY		ulative	Cumulative			
	Sub-Contra	ctor Progress	Today(est)		(est)	QTY(Verafied)	Pro	blem / Delays /	Changes
Relocate Buffer tan			0%		0%	0%			
			0%		1%	0%			
			0%	0	1%	0%			
1.1.1									
	Materia	l Delivery	Weathe	r Conditi	ons	Other (not	e equipmen	t delivery and p	ickup here)
Descripti	On	Qty.	Temp.		35				
			Wind	ä	alm]			
			Precip	.0.	1in				
 									
			† 3. – 1. d. 1. d.,	1.		•			
			i .			1			
The state of the s	- 6						1 4 1 1 2 2 2 2		
		Work Performed	<u>. </u>				<u> </u>		
ind collects post-	excavation o	f LSD and the S. Ditch. Entact is confirmation samples and send to ion and take additional post-treat	o PDC lab. C	ontinue	stabilizin	g and consolidat	LSD. Enta ing the LSD.	ct finishes load . Entact stops l	ing out NDSA loading S. Dita
							, , , , , , , , , , , , , , , , , , , 	a	
	<u> </u>	<u> </u>	· · · · · · · · · · · · · · · · · · ·					<u> </u>	
ompleted By: E	rent Hays		· <u>*/·</u>					·	

EN	ITACT S	ervices, LLC	Date	2/8/2	006	D	aily Proj	ect Summ	ary
Project Name: Project Location:		Keystone L.				Customer: ENTACT Project	t#:	Keystone Wire D-1154	& Steel
<u>:, </u>	<u> </u>	ntact Personnel		ſ			Equipm	ent	
Name	Start Time	Finish Time	Hours	 	De	escription	Mob Date	Hours	
Brent Hays	6:30 AM	5:30 PM	10.5	l 1		atsu PC 300	7/12/2005		10
Aaron McCorvey	6:30 AM	5:30 PM	10.5	. · [(Cat 950G	7/15/2005		0
						Cat D5	7/15/2005		10
		649 Personnel	,			Deere 300D	7/18/2005		<u> </u>
Fodd Shreves	6:30 AM	5:30 PM	10.5			nlay Screen /olvo 240	7/19/2005 7/25/2005		<u>0</u>
Tony Erickson lames Stout	6:30 AM 6:30 AM	5:30 PM 5:30 PM	10.5 10.5	-		/olvo 240	8/2/2005		10
lames Schmitt	6:30 AM	5:30 PM	10.5	i		n Deere 250	8/22/2005		10
Bobby Chambers	6:30 AM	5:30 PM	10.5			n Deere 250	10/14/2005		0
Ken Walker	6:30 AM	5:30 PM	10.5		Johi	n Deere 250	10/21/2005		10
Doug Graff	6:30 AM	5:30 PM	10.5	1				<u> </u>	
Doug Beare .	6:30 AM	5:30 PM	10.5					<u> </u>	
Niek Vessel	7.00 414	165 Personnel	1 40				 	 	
Nick Keagel eroy Richardson	7:00 AM 7:00 AM	5:30 PM 5:30 PM	10	· 				 	
-ordy (See Relused)	, ,,,,,,,,,,,, <u>,</u>	J.00 Fill		<u> </u>					
	Entact	Progress	QTY	Cumu		Cumulative	Pro	blem / Delays	/ Changes
Mohiliseti	Today(est)	QTY		QTY(Verafied)					
Mobilization Site Setup			0.0%	100. 100.		100.0%			
. Utility location			0.0%	100.		100.0%			
			1			100.070			will be completed as
. 01					-0.		the LSD is		can get to the east
 Clear and grub Lower South Dit 	nh Ctabilina a	nd Consolidate	0.0%	82.0 83.1		82.0% 0.0%		side of the di	ocn.
. Cower South Dill	CII SIMUILE A	nd Consolidate	0.176	05.	370	0.0%	-		
3. Lower South Dita	ch Hot Spots		0.0%	110.	0%	110.0%	Loade	d out additional tr	reated material
7. South Ditch			1.0%	88.0)%	0.0%			
. South Borrow W			0.0%	140.		0.0%	1	reating additiona	i material
		Buffer tanks, Steam Line, Piping)	0.0%	100.		0.0%			
 Stained Soil Ar Site Restoration 			0.0%	100.		0.0%	,		
2. Demobilization		·	0.0%	0.0		0.0%			
. z. zamani	-		0.0.2		~	1	Receive o	ost-excavation co	onfirmation sample
13. North ditch star	ging area		1.0%	31.0	0%	0.0%		results.	
			QTY	Cumu		Cumulative	Pro	blem / Delays	/ Changes
Salawata D. W.		ctor Progress	Today(est)	QTY		QTY(Verafied)			
Relocate Buffer tar	iks		0%	100		0%		.	
			0%	09		0%			
		2.1.4	1	4					
		I Delivery		r Condition		Other (not	e equipmen	t delivery and	pickup here)
Descripti	ion	Qty.	Temp.	21	-	<u>.</u>			
			Wind Precip	CR	m	-			
			Гісар	l <u></u>		1			
]						
			1		. " "				
	****		1	1 1 1	· *			T. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	The second second
	scription of	Work Performed	1					<u> </u>	en e
		f LSD and the S. Ditch. Entact i	s screening s	oil conditi	oner and tact rece	d hauling it to the eives post-treatm	ELSD. Con ent results f	tinue stabilizin for the S. Ditch	and continues
Entact is pumping consolidating the	LSD. Jenny	Elste begins sampling areas ou isposal. Entact also receives the						reatment/excar	vation will be
Entact is pumping consolidating the sending material	LSD. Jenny	Elste begins sampling areas ou						reatment/excav	vation will be
intact is pumping consolidating the ending material equired.	LSD. Jenny to PDC for d	Elste begins sampling areas ou			its for th	e NDSA and fur		reatment/exca	vation will be

Project Location: Bartonville, IL. Entact Personnel Equipment	EN'	TACT S	ervices, LLC	Date	2/10	/2006		aily Proj	ect Summa	-
Entact Personnel Hours Shart Time Finish Time Hours Brent Haye 8:30 AM 5:30 PM 10.5		Bartonville,	IL.				ENTACT Projec		Keystone Wire 8 D-1154	& Steel
Name Start Time Finish Time Hours							· ·		<u></u>	
Berit He's										
Aaron McCorvey 6:30 AM	Name	Start Time	Finish Time	Hours		<u> </u>	escription	Mob Date	Demob Date	. Ho
Cat DS	rent Hays	6:30 AM	5:30 PM	10.5		Kon	natsu PC 300	7/12/2005		
Cat DS	aron McCorvey	6:30 AM	5:30 PM	10.5			Cat 950G	7/15/2005		
Continues					:		Cat D5	7/15/2005		1
Todd Shrowes			649 Personnel			Johi				
Tony Erickson	odd Shrawes			10.5						
James Schrift 6:30 AM										
James Schmitt 6:30 AM					. :					
Sobby Chambers 6:30 AM										1
Manual Review 6:30 AM 5:30 PM 10.5					1					<u>_</u>
Doug Graff 8:30 AM 5:30 PM 10.5 165 Personnel 10.5			<u> </u>						 	
Doug Beare 8:30 AM 5:30 PM 10.5 165 Personnel 165						Jor	III Deele 250	10/21/2005		1
Nick Keage 7:00 AM 5:30 PM 10 10								 	 	
Nick Keagel 7:00 AM 5:30 PM 10 Leroy Richardson 7:00 AM 5:30 PM 10 Entact Progress	oug Beare	6:30 AM	<u> </u>	10.5	1			⊢—	 	
Leroy Richardson 7:00 AM 5:30 PM 10						L				
Entact Progress Today(est) 1. Mobilization 2. Site Setup 0.0% 100.0%								L		
Entact Progress 1. Mobilization 2. Site Setup 3. Utility location 3. Utility location 4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch Hot Spots 8. South Borrow Waste Pile 8. South Sorrow Waste Pile 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 10. Stained Soil Area 10. South ditch staging area 5. South Sitch staging area 6. South Sitch stagi	ercy Richardson	7:00 AM		10		L			<u> </u>	
Entact Progress Today(est) QTY(est) QTY(verafied) Problem / Delays 1. Mobilization 0.0% 100.	1.2			·						
1. Mobilization 0.0% 100.0% 100.0% 100.0% 100.0% 2. Site Setup 0.0% 100.		Entact	Progress	_				Pro	blem / Delavs /	Change
2. Site Setup 3. Utility location 4. Clear and grub 5. Lower South Ditch Hot Spots 6. Lower South Ditch Hot Spots 7. South Ditch 8. South Borrow Waste Pile 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10.0% 10.0% 10.0% 10.0% 10.0% 1	****									
3. Utility location 4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch Hot Spots 8. South Borrow Waste Pile 9. 0.0% 110.0%										
4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch Hot Spots 8. South Brorrow Waste Pile 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 10.0% 1							+			
4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch 8. South Ditch 8. South Ditch 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stairing Soil Arriss 10.0% 10.0% 10.0% 10.0% 10.0% 10.0% 11. Site Restoration 10.0% 10.	Utility location			0.0%	10	0.0%	100.0%			
4. Clear and grub 5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch 8. South Ditch 8. South Ditch 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 11. Site Restoration 12. Demobilization 13. North ditch staging area 15.0% 10.0%]	ļ		1			
5. Lower South Ditch Stabilize and Consolidate 6. Lower South Ditch Hot Spots 7. South Ditch Hot Spots 9. 0.0% 110.0% 29.0% 0.0% 8. South Borrow Waste Pile 0.0% 1.0% 140.0% 0.0% Treating additional 1.0% 100.0% 0.0% 140.0% 0.0% 150.0%	Close and and			0.00			92.00	me LSD is		
6. Lower South Ditch Hot Spots		h Otal !!!						 	Side of the dit	J1.
7. South Ditch 8. South Borrow Waste Pile 9. On the standard Street Intervention (Continue in situ Continue in situ Continue Intervention (Continue Intervention	Lower South Ditc	in Stabilize a	and Consolidate	0.1%	- 83	5.5%	0.0%	 		
7. South Ditch 8. South Borrow Waste Pile 9. On the standard Street Intervention (Continue in situ Continue in situ Continue Intervention (Continue Intervention										
8. South Borrow Waste Pile		h Hot Spots	J					Loade	d out additional tre	ated mate
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping) 10. Stained Soil Area 10. Own 10. Stained Soil Area 11. Site Restoration 10. Own 11. Site Restoration 10. Own 11. Demobilization 11. Demobilization 11. North ditch staging area 11. Sub-Contractor Progress 11. North ditch staging area 11. Sub-Contractor Progress 11. North ditch staging area 12. Demobilization 13. North ditch staging area 15. Own 16. Own 17. Cumulative Cumulative QTY(Verafied) 18. Own 19. Own 10. Own										
10. Stained Soil Area 11. Site Restoration 12. Demobilization 13. North ditch staging area 15.0% 16. O% 17. Cumulative QTY Cumulative QTY(verafied) 18. North ditch staging area 19. O% 10.0% 10									reating additional	material
11. Site Restoration 12. Demobilization. 13. North ditch staging area 15.0% 16. O% 17. Cumulative 17. Cumulative 18. Sub-Contractor Progress 18. O% 19. O% 10. O% 1			Buffer tanks, Steam Line, Piping)		_			<u> </u>		
12. Demobilization. 0.0% 0.0% 0.0% 0.0% 13. North ditch staging area 5.0% 38.0% 0.0% Continue in-situ QTY Cumulative QTY(Verafied) Problem / Delays Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% Temp. 33 Wind catm Precip T rain Description of Work Performed Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizin					-			ļ		
13. North ditch staging area 5.0% 38.0% Cumulative Cumulative QTY (est) QTY(est) QTY(vest) QTY(verafied) Problem / Delays Relocate Buffer tanks 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%								<u> </u>		
Sub-Contractor Progress Relocate Buffer tanks 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%	2. Demobilization			0.0%	0	.0%	0.0%	ļ		
Sub-Contractor Progress Relocate Buffer tanks 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%										
Sub-Contractor Progress Today(est) Cumulative QTY(Verafied) Problem / Delays	3. North ditch stagi	ing area		5.0%	36	3.0%			Continue in-situ tre	atment
Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%				QTY	Cum	ulative	Cumulative		blom / Deless /	Channe
Relocate Buffer tanks 0% 100% 0% 0% 0% 0% 0% 0% 0% 0% 0% 0%		Sub-Contra	actor Progress	Today(est)	QT	r(est)	QTY(Verafied)	PTC	ibiem / Delays /	∪nange:
Material Delivery Weather Conditions Other (note equipment delivery and Description Qty. Temp. 33 Wind calm Precip T rain Description of Work Performed Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizing								I .		
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March 8, 2006

3129 Bass Pro Drive Grapevine, Texas 76051

Mr. Jonathan Adenuga U.S. EPA Region 5, DE-9J 77 W. Jackson Boulevard Chicago, Illinois 60604-3507

RE:

Keystone Steel & Wire Company

7000 SW Adams Street, Peoria, Illinois

Dear Jonathan:

On behalf of the Keystone Steel & Wire Company, ENTACT Services LLC (ENTACT) is transmitting the attached responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments dated February 1, 2006 for the *Corrective Measures Implementation Workplan*. For reviewing convenience, U.S. EPA's comment is provided, followed by ENTACT's corresponding response in italicized type.

As requested in your February 1, 2006 letter, ENTACT has also revised the *Corrective Measures Implementation Workplan* to address your comments as indicated in ENTACT's responses. Two copies of the *Corrective Measures Implementation Workplan*, *Revision 1* are included in this submittal for your approval.

If you have any questions or concerns regarding this submittal, please feel free to contact me at (972) 580-1323, Chad Erdman with Keystone at (309) 697-7165 or Russ Perry on behalf of Keystone at (309) 697-7538.

Respectfully,

Thad Slaughter

ENTACT Services LLC

Enclosure

cc:

Chad Erdman, Keystone Steel & Wire Company

Russ Perry, on behalf of Keystone Jenny Elste, ENTACT Services LLC

ATTACHMENT 1

Comments developed during this review are presented below, following the comment numbering used in the response letter for ease of review.

1. The table provided in this response adequately addresses U.S. EPA's request for specific action levels for each sample type and media.

ENTACT Response: This table has been added to Section 1.1 of the Field Sampling Plan (FSP).

2. The response to this comment is acceptable.

ENTACT Response: The text and Figure 1 of the FSP have been modified as stated in our response.

3. In the response to this comment, ENTACT clarifies that F-Pond soil and sediment will not be removed from in-situ treatment area until toxicity characteristic leaching procedure (TCLP) analytical results confirm that the media no longer exhibit the toxicity characteristic for lead and will not be considered hazardous waste when generated. This approach is acceptable and should be specifically stated in the CMI WP.

ENTACT's Response: ENTACT has modified the text in the CMI Workplan to reflect the approach for treating F-Pond soil and sediment as described in our response to U.S. EPA's comment.

4. The response to this comment is acceptable.

ENTACT Response: ENTACT has modified Sections 3.2.5 and 3.3.4 of the CMI Workplan as stated in our response.

5. The response to this comment is acceptable.

ENTACT's Response: Section 3.2.5 of the CMI Workplan has been modified as indicated in our response.

6. The response to this comment is acceptable.

ENTACT's Response: U.S. EPA's comment is noted.

7. The response to this comment is acceptable, including ENTACT's request for a modification allowing in-situ treatment to render soil at the North Ditch Staging Area nonhazardous prior to excavation (i.e., consistent with the corrective action approach for soil and sediment at the F-Pond).

ENTACT's Response: Sections 3.3.4 and 3.3.5 have been modified as discussed in our response.

8. ENTACT's explanation for placement of compacted road base material over the North Ditch Staging Area is acceptable and should be added to the text of the CMI WP.

ENTACT's Response: Section 3.3.6 has been modified as requested in U.S. EPA's comment.

9. U.S. EPA Comment No. 9: Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area). The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging Area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to be installed at the north end of the pond and another new wells to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

ENTACT's Response: Sections 3.2.9 and 3.3.8 have been modified to address U.S. EPA's comment from the January 4, 2006 letter. Refer to Figure 2 for the proposed locations for the groundwater monitoring wells.

10. The response to this comment is acceptable.

ENTACT's Response: Section 4.1.2 and applicable sections of the QAPP have been modified to address U.S. EPA's comment concerning quarterly progress reports.

11. The response to this comment is acceptable.

ENTACT's Response: The work schedule presented in the Section 2.2 of Appendix A-SWPPP has been modified as discussed in our response.

12. The response to this comment is acceptable.

ENTACT's Response: The SWPPP-Appendix A has been modified as discussed in our response.

13. The response to this comment is acceptable, although the particular approach to be implemented for storm water control has not been specified. It is recommended that the CMI WP and Stormwater Pollution Prevention Plan be clarified to note that earthen berms and hay bales may be used both upgradient and/or downgradient of excavation/work areas, depending on site conditions and project needs.

ENTACT Response: The Section 3.2 of Appendix A-SWPPP has been modified based on U.S. EPA's comment.

14. Although from a practical standpoint ENTACT's approach to sediment management appears to make sense, the response to this comment is not acceptable. Under the scope of work currently proposed, soil at both sites will now be treated in-situ to avoid generation of a hazardous waste when the soil is disturbed. If the sediment accumulations along the silt fences are found to exhibit the toxicity characteristic for lead, movement of these materials could also be considered generation of a hazardous waste. If it is feasible to treat the accumulated sediments in place to render them nonhazardous when generated, ENTACT should consider sampling the sediments in place for characterization purposes prior to disturbing them. Care should be taken to ensure that the collected samples are adequately representative of the entire volume of accumulated sediments. Alternatively, ENTACT could temporarily containerize sediment accumulations

along the silt fencing, pending TCLP analysis. Sediments found not to exhibit the toxicity characteristic for lead could be returned to the excavated areas after post-excavation confirmation sampling indicates that remediation goals have been achieved. Sediments found to exhibit the toxicity characteristic for lead would require appropriate off-site disposal as hazardous waste.

ENTACT's Response: To clarify ENTACT's previous response, we offer the following: The silt fence is located within the AOC of each unit. Soils collected behind the silt fence, prior to the completion of excavation to achieve the remediation goals, will be moved to an area undergoing in-situ treatment within the AOC, thus eliminating the "new" point of generation issue. Upon completion of the excavation, the silt fences will be removed and the area will be graded.

15. The response to this comment is acceptable.

ENTACT's Response: Figures 1 and 2 of Appendix A-SWPPP have been modified as stated in our response.

16. The response to this comment is acceptable.

ENTACT's Response: Section 4 of Appendix A-SWPPP has been modified as stated in our response.

17. The response to this comment is acceptable.

ENTACT's Response: Appendix A-SWPPP has been modified as stated in our response.

18. The response to this comment is acceptable.

ENTACT's Response: U.S. EPA's comment is noted.

19. The response to this comment is acceptable.

ENTACT's Response: U.S. EPA's comment is noted.

20. The response to this comment is acceptable.

ENTACT's Response: Appendix B-FSP has been modified to reflect our response.

21. The response to this comment is acceptable.

ENTACT's Response: Section 4.1 of Appendix B-FSP has been modified based on our response.

22. The response to this comment is acceptable.

ENTACT's Response: Appendix B-FSP has been revised based on our response.

23. The response to this comment is acceptable.

ENTACT's Response: U.S. EPA's comment is noted.

24. U.S. EPA Comment No. 24: QAPP (Appendix C) Section A.6.1.6, Groundwater. Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and

sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

ENTACT's Response: Section A.6.1.5 of Appendix C-QAPP has been modified pursuant to U.S. EPA's comment from the January 4, 2006 letter.

25. The response to this comment is acceptable.

ENTACT's Response: Section A.9.4.1 of Appendix C-QAPP has been modified based on our response.

26. The response to this comment is acceptable.

ENTACT's Response: Section B.5.1.2 of Appendix C-QAPP has been modified based on our response.

27. The response to this comment needs to be further clarified. ENTACT indicates that they will "review all of the data to ensure adequacy for use in verifying attainment of remediation goals. This statement suggests that all of the data obtained during the CMI field effort will be validated. ENTACT should confirm that this interpretation is accurate and should specifically reference guidance to be used in the data validation effort (i.e., the National Functional guideline for Organic/Inorganic Data Review).

ENTACT's Response: For clarification purposes, ENTACT reviews all of the data reports received from the laboratory using a Sample Data Evaluation Checklist developed by ENTACT. This checklist is completed by the Regulatory/Technical Officer for approximately 30% of the data reports. The remaining 70% of the data reports are reviewed using the checklist as a guide. Any issues identified during the data review, e.g., percent recoveries outside of control limits, method blank detections, incorrect detection limits, etc., are discussed with the laboratory's Project Manager and the appropriate actions are taken, e.g., sample analyses are re-run, QC data is re-verified by the laboratory, data report is revised and re-issued, etc. A sample copy of the Sample Data Evaluation Checklist is provided for your review.

28. The response to this comment is acceptable.

ENTACT's Response: Tables 1 and 2 of Appendix C-QAPP have been modified based on our response.

29. The response to this comment is partially acceptable. Issues pertaining to Practical quantification limits have been adequately addressed. However, no Discussion is provided in the response with regard to accuracy criteria for each of the volatile and semivolatile organic compounds constituents of concern. The Subject table must still be modified to provide the requested information.

ENTACT's Response: Accuracy criteria for each of the volatile organic compounds and semi-volatile organic compounds measured was not specifically provided in Table 2 of the QAPP due to the fact that these criteria change periodically. The laboratory compiles data and statistically computes the accuracy requirements, i.e. acceptable percent recoveries, for the laboratory control samples and matrix spike/matrix spike duplicates for each organic constituent measured, while still following the requirements of the SW-846 methods. Because the accuracy criteria are updated periodically by the laboratory, the phrase "varies by analyte" was included under the

accuracy column for volatile organic compounds and semi-volatile organic compounds on Table 2 of the QAPP.

KEYSTONE STEEL & WIRE COMPANY SOIL SAMPLE DATA EVALUATION CHECKLIST PROJECT NUMBER D1154

Lab File Numbers:		
Sample Location/Type:		
Analytical Methods:	· · · · · · · · · · · · · · · · · · ·	·
	YES	NO
10. Field Duplicate Precision Field duplicates are used to assess the precisi particular sample matrix. No control limit was specified in the Workplan,		
Were all field duplicate RPDs within control lim Field duplicates are not collected for TCLP sai		or total samples.
11. Was the project completeness goal met?	·	·
Comments:		
	•	
•		
	Signed:	
	Date:	

Field Precision Assessment RPD=D1-D2/(D1+D2)/2 X 100

Sample No.	coc	Primary Sample Result	Duplicate Sample Result	RPD (%)	> or < 40%	Sample ID No.
1	Lead			#DIV/0!	#DIV/0!	
		** ,		-		

KEYSTONE STEEL & WIRE COMPANY SOIL SAMPLE DATA EVALUATION CHECKLIST PROJECT NUMBER D1154

Lab File Numbers:		
Sample Location/Type:		
Analytical Methods:	· · · · · · · · · · · · · · · · · · ·	
1. Chain of Custody (COC) Records: Are the COCs present with lab report? Are the COCs complete and signed off? Were all samples on the COCs analyzed?	YES NO	
Was a project narrative available from the laboratory? Were any problems noted in the lab narrative?		
3. Were all holding times met?		
4. Was the frequency stated in the Workplan for field duplicates, equipment rinsate, and trip blanks met?	·	
5. Were the field blank and method blank results non-detectable (ND)?		- · · · · · · · · · · · · · · · · · · ·
6. Were all matrixes, units, and detection limits reported correctly? Detection limits were reported per IEPA ADL/PQL.		
7. Were detection limits below action limits? See above	<u> </u>	
8. Accuracy Accuracy of the analysis results were evaluated using the percent recovery results for the matrix spike (MS) samples and laboratory control sample (LCS) samples. Note: MS/MSD and LCS Limits for Totals Pb: 80-120% LCS, 75-125% MS/MSD Pb: 80-120% LCS, 75-125%	% MS/MSD	
Were all MS/MSD spike recoveries within control limits? Were all LCS spike recoveries within control limits?	· · · · · · · · · · · · · · · · · · ·	
9. Precision Precision of the analysis results were evaluated using the relative percent difference (RPD) for the MS/MSD pairs. Note: RPD 0-20% inorg, 0-40% org Were all duplicate RPDs within control limits?		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGIONS 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

February 16, 2006

REPLY TO THE ATTENTION OF:

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Financial Assurance demonstration Keystone Steel & Wire Company EPA ID No. ILD 000 714 881

Dear Mr. Perry:

As was indicated in our January 4, 2006 letter, Keystone Steel & Wire (KS&W) was required to demonstrate that adequate funds will be available for the completion of the selected remedy for the F-Pond and North Ditch Staging Area at the KS&W facility. This financial assurance demonstration was due on January 19, 2006. The U.S. EPA granted KS&W's request that this due date be extended to February 17, 2006. However, based on our February 14, 2006 conference call, KS&W claims that 50% of the approved remediation work at the F-Pond and North Ditch Staging Area has been completed and the implementation of the remaining portion of the remedy at these two units will be completed in 45 days. Therefore, the financial assurance demonstration would not be necessary. Based on this information, the U.S. EPA has agreed to grant KS&W another 45 days extension in lieu of submitting the financial assurance demonstration contingent upon KS&W satisfying the following:

- 1) Submit to the U.S. EPA all documentation relating to all approved remediation work performed at the F-Pond and the North Ditch Staging Area as of February 14, 2006. This information must include all invoices paid to ENTACT, description of each item of the CMI workplan completed, drawing and any photographs of the completed work and date(s) work was performed. This document must be signed by a responsible corporate officer as defined in 40 CFR 270.11.
- 2) By April 21, 2006, KS&W must prepay a total of \$500,000 to ENTACT. KS&W indicated that ENTACT has agreed to complete the entire remedy approved for the F-Pond and North Ditch Staging Area for the sum total of \$500,000. KS&W must submit to U.S. EPA all documents relating to all approved remediation work performed at the F-Pond and the North Ditch Staging Area after February 14, 2006. This information must include invoices paid to ENTACT for all work performed After February 14, 2006, description of all remaining items of the CMI workplan completed, including drawings and photographs of completed work after February 14, 2006. This document must be signed by a responsible corporate officer as defined in 40 CFR 270.11.

Item No. 1 above must be submitted to U.S. EPA within 7 days of receipt of this letter. U.S. EPA will review the document and notify KS&W of its findings. KS&W must also notify U.S. EPA within 7 days of complying with item No. 2 above.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Import

Sincerel

Jonathan Adenuga

Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA

Cc: Connie Crossley, Booze-Allen



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

February 1, 2006

REPLY TO THE ATTENTION OF $$^{\mbox{\sc DE}-9J}$$

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Russ R. Perry Manager, Energy & Environmental Engineering Keystone Steel & Wire Company 7000 S.W. Adams Street Peoria, Illinois 61641-0002

Re: Response to Keystone Steel & Wire's response Keystone Steel & Wire Company

EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed the review of your January 13, 2006 response to U.S. EPA's January 24, 2006 comments to your Corrective Measures Implementation (CMI) workplan. As we indicated in the January letter, the enclosed Attachment provides U.S. EPA's response to your CMI workplan. Please revise the CMI workplan to address the remaining issues identified in the Attachment and submit the revised workplan within 30 days of receipt of this letter.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely

Jonathan Adenuga

Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA

Cc: Connie Crossley, Booze

ATTACHMENT

Comments developed during this review are presented below, following the comment numbering used in the response letter for ease of review.

- 1. The table provided in this response adequately addresses U.S. EPA's request for specific action levels for each sample type and media.
- 2. The response to this comment is acceptable.
- 3. In the response to this comment, ENTACT clarifies that F-Pond soils and sediment will not be removed from the in-situ treatment area until toxicity characteristic leaching procedure (TCLP) analytical results confirm that the media no longer exhibit the toxicity characteristic for lead and will not be considered hazardous waste when generated. This approach is acceptable and should be specifically stated in the CMI WP.
- 4. The response to this comment is acceptable.
- 5. The response to this comment is acceptable.
- 6. The response to this comment is acceptable.
- 7. The response to this comment is acceptable, including ENTACT's request for a modification allowing in-situ treatment to render soil at the North Ditch Staging Area nonhazardous prior to excavation (i.e., consistent with the corrective action approach for soil and sediment at the F-Pond).
- 8. ENTACT's explanation for placement of compacted road base material over the North Ditch Staging Area is acceptable and should be added to the text of the CMI WP.
- 9. The response to this comment is acceptable.
- 10. The response to this comment is acceptable.
- 11. The response to this comment is acceptable.
- 12. The response to this comment is acceptable, although the particular approach to be implemented for stormwater control has not been specified. It is recommended that the CMI WP and Stormwater Pollution Prevention Plan be clarified to note that earthen berms and hay bales may be used both upgradient and/or downgradient of excavation/work areas, depending on site conditions and project needs.
- 13. Although from a practical standpoint ENTACT's approach to sediment management appears to make sense, the response to this comment is not acceptable. Under the scope of work currently proposed, soil at both sites will now be treated in-situ to avoid generation of a hazardous waste when the soil is disturbed. If the sediment accumulations along the silt fences are found to exhibit the toxicity characteristic for lead, movement of these materials could also be considered generation of a hazardous waste. If it is feasible to treat the accumulated sediments in place to render them nonhazardous when generated, ENTACT should consider sampling the sediments in place for characterization purposes prior to disturbing them. Care should be taken to ensure that the collected samples are adequately representative of the entire volume of accumulated sediments. Alternatively, ENTACT could temporarily containerize

sediment accumulations along the silt fencing, pending TCLP analysis. Sediments found not to exhibit the toxicity characteristic for lead could be returned to the excavated areas after post-excavation confirmation sampling indicates that remediation goals have been achieved. Sediments found to exhibit the toxicity characteristic for lead would require appropriate off-site disposal as hazardous waste.

- 14. The response to this comment is acceptable.
- 15. The response to this comment is acceptable.
- 16. The response to this comment is acceptable.
- 17. The response to this comment is acceptable.
- 18. The response to this comment is acceptable.
- 19. The response to this comment is acceptable.
- 20. The response to this comment is acceptable.
- 21. The response to this comment is acceptable.
- 22. The response to this comment is acceptable.
- 23. The response to this comment is acceptable.
- 24. The response to this comment is acceptable.
- 25. The response to this comment needs to be further clarified. ENTACT indicates that they will "review" all of the data to ensure adequacy for use in verifying attainment of remediation goals. This statement suggests that all of the data obtained during the CMI field effort will be validated. ENTACT should confirm that this interpretation is accurate and should specifically reference guidance to be used in the data validation effort (i.e., the National Functional Guidelines for Organic/Inorganic Data Review).
- 26. The response to this comment is acceptable.
- 27. The response to this comment is partially acceptable. Issues pertaining to practical quantification limits have been adequately addressed. However, no discussion is provided in the response with regard to accuracy criteria for each of the volatile and semivolatile organic compounds constituents of concern. The subject table must still be modified to provide the requested information.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

January 24, 2006

REPLY TO THE ATTENTION OF $^{DE-9J}$

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Response to Keystone Steel & Wire's response Keystone Steel & Wire Company EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed the review of your January 13, 2006 letter and response to U.S. EPA's January 2006 comments to your Corrective Measures Implementation (CMI) workplan. There are two separate issues identified in your letter. The first issue deals with groundwater monitoring at the F-pond and the North Ditch Staging Area and the financial assurance requirement. The second issue deals with the main body of the CMI workplan. By this letter, the U.S. EPA is transmitting its response only to the first issue in your letter. Response to your second issue will be addressed separately.

As stated in comment No. 9 of your response, "based on the selected remedy", you believe that an area that will be clean closed to industrial standards should not require groundwater monitoring. Therefore, you are requesting additional clarification on the purpose and objective of the groundwater monitoring requested by U.S. EPA. In response to your request, we offer the following:

Your use of the phrase "clean closed" to industrial standards is somewhat misleading. When you use the phrase clean closed, you are implying that you have returned the site to its original pristine state. This will not be the case with the particular remedy approved for Keystone Steel & Wire (KS&W) facility. The U.S. EPA approved a remedy that allows KS&W to conduct a an in-situ treatment of waste and impacted soils at the F-Pond and the North Ditch such that, they no longer exhibit the toxicity characteristic for lead. Because the treated materials no longer exhibit the toxicity characteristic for lead, does not mean, that lead is no longer present in the treated material. In addition to the in-situ treatment, KS&W is also required to excavate all impacted soil/sediment that exceed the remediation goal of 800mg/kg total lead. Regardless of the fact that the lead concentrations in the sediment/soils left in place are below the 800mg/kg standard, the potential for lead in the treated material to migrate to the underlying groundwater still exist.

Furthermore, the in-situ treatment remedy at the KS&W facility does not preclude the use of other investigative tools that could and should be used at the F-Pond and the North Ditch Staging Area (i.e. performance monitoring). A necessary

component of any ongoing corrective action at a facility is the establishment and implementation of a groundwater monitoring program to demonstrate the effectiveness of the implemented remedy. The groundwater pathway at the KS&W facility is an integral part of the environment that must be investigated. Demonstrating the efficacy of the in-situ treatment, is not only done through post treatment sampling, it also includes the demonstration that the groundwater beneath these units has not been impacted. More importantly, there are no reliable current groundwater data specific to the F-Pond and the North Ditch areas that could be used to qualify the nature of the underlying groundwater. Therefore, Groundwater monitoring ensures the long-term objective of the Corrective Action Program.

Finally, the approved remedy for the KS&W facility does not include any contingencies for an Operation and Maintenance (O&M) program. An O&M program provides an opportunity for ensuring that the implemented remedy is working as intended. In the absence of an O&M program, groundwater monitoring becomes the only available tool for use in ensuring the long term objective of the final remedy. The U.S. EPA continues to insist that KS&W comply with the groundwater monitoring program proposed in the January 2006, letter.

In response to your request for clarification regarding the financial assurance requirement for the corrective measures at the F-Pond and the North Ditch Staging Area, we refer you to the September 30, 2003 memorandum cited in following U.S. EPA website:

http://www.epa.gov/compliance/resources/policies/cleanup/rcra/interim-fin-assurcor-act.pdf

We hope this clarifies U.S. EPA's position regarding the purpose and objective of the groundwater monitoring for the F-Pond and the North Ditch Staging Area and the financial assurance requirement.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

princerery,

Jonathan Adenuga

Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA

Cc: Connie Crossley, Booze-Allen



3129 Bass Pro Drive

Grapevine, Texas

76051

January 13, 2006

Mr. Jonathan Adenuga U.S. EPA Region 5, DE-9J 77 W. Jackson Boulevard Chicago, Illinois 60604-3507

RE: Keystone Steel & Wire Company 7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga: Jou

On behalf of the Keystone Steel & Wire Company, ENTACT Services LLC (ENTACT) is transmitting the responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments dated January 4, 2006 for the *Corrective Measures Implementation Workplan*. For reviewing convenience, U.S. EPA's comment is provided, followed by ENTACT's corresponding response in italicized type. Pending U.S. EPA's acceptance of ENTACT's responses, the cited sections of the *CMI Workplan* will be revised, as indicated in the responses, and a copy of the revised CMI Workplan will be submitted to U.S. EPA.

Regarding U.S. EPA's Comment No. 9, we would like to request further clarification of the groundwater monitoring requirements for the F-Pond and the North Ditch Staging Area. We are unclear as to the purpose and objective of the groundwater monitoring given the fact that the F-Pond and North Ditch Staging Area will be clean closed to an industrial standard. Additional clarification of U.S. EPA's position with respect to groundwater monitoring would be appreciated and the objectives of this groundwater monitoring program to assist us in designing an appropriate groundwater monitoring program.

On a separate, but related issue, we would also clarification of the financial assurance requirements for the corrective measures as presented in the October 19, 2005 Final Decision and Response to Comments and Statement of Basis. It is our understanding, based on conversations with you, that this requirement is now U.S. EPA policy. We would like to request a copy of this policy and an extension to the January 19, 2005 submittal deadline. An extension to February 17, 2005 to submit proof of this financial assurance would be appreciated.

If after your review of this letter, you would like additional clarification from us, please feel free to contact me at (972) 580-1323, Chad Erdman with Keystone at (309) 697-7165 or Russ Perry on behalf of Keystone at (309) 697-7538.

Respectfully,

Thad Slaughter

ENTACT Services LLC

Enclosure

cc: Chad Erdman, Keystone Steel & Wire Company

Russ Perry, on behalf of Keystone Jenny Elste, ENTACT Services LLC

Kylin

ENTACT's Response to U.S. EPA's Comments Dated January 4, 2006 Regarding the Corrective Measures Implementation Workplan for the Keystone Steel & Wire Company's Peoria Facility

U.S. EPA Comment No. 1: Action levels should be specified in the CMI WP for each of the sample types to be collected. Comparison criteria for surface water and groundwater data should be identified.

ENTACT Response: The following table will be included in Section 1 of the Field Sampling Plan.

	GOALS					
Sample	Constituents of	F-Pond	North Ditch	Backfill/		
Type	Concern		Staging Area	Topsoil		
XRF Field	Lead	800 ppm	800 ppm			
Screening	Iron	100,000 ppm				
Surface Water	Lead	Water will be				
		transferred to the	9 mm			
		facility WWTP				
	Iron	for discharge				
	I I OII	with facility				
		wastewaters.				
		The discharge				
	Manganese	will meet the	and the same of th			
		limits specified				
	 	in the facility's				
	Trichloroethylene	NPDES permit.				
Characterization	Lead	800 mg/kg				
	Iron	100,000 mg/kg	36.823.045 1900			
	TCLP Lead	5 mg/l	5 mg/l			
Post-excavation	Lead	800 mg/kg	800 mg/kg			
Confirmation	Iron	100,000 mg/kg				
	TCLP Lead	5 mg/l	5 mg/l			
Post-treatment	TCLP Lead		5 mg/l			
Verification (for	· · · · · · · · · · · · · · · · · · ·					
CAMU option)						
Backfill/Topsoil	Arsenic		Section 100 Sectio	13 mg/kg		
	Barium			14,000 mg/kg		
	Cadmium	Marin Land British Com		200 mg/kg		
	Chromium			420 mg/kg		
	Lead			400 mg/kg		
	Mercury			61 mg/kg		
	Selenium	10 M		1,000 mg/kg		
	Silver	SI-SIN MACANIAN	1942 19 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1,000 mg/kg		
	TPH	Contract of the second	. 30 No. 14 No. 15 V	100 mg/kg		
Groundwater	Lead	0.015 mg/l	0.015 mg/l			

U.S. EPA Comment No. 2: Section 3.2.4, Identification of Characteristically Hazardous Sediment/Soil (F-Pond). According to this section, a four-part composite sample will be collected from each F-Pond grid to identify soil and sediment exhibiting the toxicity characteristic for lead. The four composite sample parts will be collected from the four corners of each grid, specifically within 5 to 10 feet of each corner. Based on

the 50 by 50 foot grid spacing specified in Section 3.1.9, this proposed sample distribution clusters sampling close together at the corners of neighboring grids, while leaving a relatively large area in the center of the grid unrepresented. Unless additional justification is provided regarding the potential effectiveness of this sampling plan, a five-part composite sampling program (including one sample portion from the grid center) should be implemented. Alternatively, the sampling plan can be revised to more evenly distribute composite sampling locations (e.g., along the grid diagonals approximately 15 to 20 feet from the sample corners). In addition, the composite sampling depth should be specified in this section. Revise all project documentation accordingly. In particular, figures in the FSP should be modified to show the specified grid size, rather than a 25 by 25 foot grid.

ENTACT Response: Grids located in the F-Pond will have a uniform square footage of approximately 2,500 square feet, but may have differing lengths or widths in order to conform to the perimeter of the unit. The depiction of the grids on Figure 1 of the Field Sampling Plan is correct; however, the bar scale is incorrect. The bar scale will be revised to reflect 50 and 100 foot lengths.

The composite samples collected from each grid area will consist of 5 parts with 1 part each collected from within 5 to 10 feet of each grid corner and from the center of the grid. The samples will be collected from a depth of 0 to 6 inches below ground surface. The text will be modified to reflect our response to U.S. EPA's comment

U.S. EPA Comment No. 3: Section 3.2.5, In-Situ Treatment and Stabilization (F-Pond). As outlined in the April 2005 CMP, corrective measures planned for the F-Pond include in-situ treatment of characteristically hazardous soils and sediment to render them non-hazardous, followed by excavation to achieve remediation goals for total lead and iron. Section 3.2.5 of this CMI WP also calls for in-situ treatment of characteristically hazardous soils and sediment at the F-Pond, followed immediately by excavation and stockpiling on site within the footprint of the F-Pond. Rather than sample the treated soil and sediment in place to confirm that the media no longer exhibit the toxicity characteristic for lead, Keystone proposes to collect samples from the various stockpiles for hazardous waste characterization purposes. This proposal is unacceptable. All post-treatment characterization sampling of F-Pond soil and sediment should be conducted while the soil and sediment remains in place. Excavation should not occur until sampling results confirm that the treated soil and sediment will not be considered hazardous when disturbed (even if remaining within the F-Pond footprint).

ENTACT Response: For clarification purposes, ENTACT offers the following discussion: Upon the completion of in-situ treatment, the material will be re-sampled in place, in volumes of approximately 300 cubic yards, within the treatment area for characterization purposes. The material will not be removed from the treatment area until analytical results are received which indicate successful treatment. At that point, the material will be staged for off-site disposal.

The sampling conducted after the completion of in-situ treatment is considered in-situ post-treatment characterization sampling and not post-treatment verification sampling. Post-treatment verification sampling will only be conducted where the impacted material is removed from the excavation, placed in a treatment CAMU, treated, and sampled to determine if the soil no longer contains a waste that exhibits the toxicity characteristic for lead, and determine if the applicable LDRs have been achieved before the material is sent off-site for disposal in a permitted Subtitle D landfill.

U.S. EPA Comment No. 4: Section 6.1.1 of the April 2005 CMP indicates that a treatability study will be performed to determine the appropriate additive and dosage for rendering F-Pond soils and sediments non-hazardous when generated. Section 3.2.5 of the CMI WP indicates that the contractor will rely on previous experience with the treatment of soil and sediment at sites with similar characteristics in lieu of a formal treatability study. This proposal is acceptable, as long as Keystone ensures that treatment objectives for the

F-Pond are ultimately met. In addition, additional detail should be provided in this section of the CMI WP to document the expected dosage of triple superphosphate (TSP) for soil/sediment at the F-Pond, or specific field methods the contractor will use to determine that sufficient TSP has been added to render the soils non-hazardous and ready for TCLP sampling. The TSP dosage ratio should also be provided in Section 3.3.5 for treatment at the North Ditch Staging Area.

ENTACT Response: Within each grid, the areal extent and depth of the lead-impacted soils is known. Based on this information, an approximate weight of the lead-impacted soils to be treated is known, and based on that weight calculation, TSP will be added at a dosage rate of 2-5% by weight of the material to be treated. ENTACT will determine the success of the in-situ treatment process through the collection of post-treatment characterization samples at a frequency of 1 sample per 300 cubic yards. In-situ treatment will be considered successful when the results of the characterization sampling analysis are less than 5 mg/l TCLP lead. ENTACT will modify the CMI Workplan to reflect our response to your comment.

U.S. EPA Comment No. 5: The second paragraph of this section indicates that wet impacted soil and sediment with total lead and/or iron concentrations above applicable remediation goals will be solidified to remove free liquids prior to transportation for off-site disposal. Unless the soil will be solidified prior to excavation, the CMI WP should be expanded to clarify how free liquids in the stockpiled soil/sediment will be controlled such that additional areas within the F-Pond footprint are not negatively impacted.

ENTACT Response: ENTACT will modify the CMI Workplan to state that wet, impacted soil and sediment will be stabilized in place prior to excavation.

U.S. EPA Comment No. 6: Section 3.2.8, Restoration (F-Pond). This section of the document seems to indicate that the only Nationwide Permit 38 restoration requirement applicable to the F-Pond corrective measures proposal involves grading for drainage. Keystone should confirm that this interpretation is correct and specifically clarify that such grading is the only mandatory restoration activity.

ENTACT Response: The restoration activities were clearly stated in the Nationwide 38 Permit Application and specifically discussed with the U.S. ACOE upon its receipt of the application. The Nationwide 38 Permit Application was approved by the U.S. ACOE for the stated remedial activities associated with the F-Pond Area. Due to the quality and size of the wetlands delineated in the F-Pond Area, and to the nature and location of the F-Pond, i.e. within an active industrial site and adjacent to 2 industrial sludge lagoons and a stormwater outfall, additional restoration measures were not required by the U.S. ACOE.

U.S. EPA Comment No. 7: Section 3.3.5, Treatment (North Ditch Staging Area). According to this section, one post-treatment verification grab sample will be collected from each treated soil stockpile at the North Ditch Staging Area (i.e., one sample for TCLP analysis for each 300 cubic yards of treated soil). Keystone should verify that the receiving Subtitle D landfill facility will accept this sampling ratio for hazardous waste characterization or will require more frequent characterization sampling and analysis. In addition, Keystone should provide justification for collecting only a single grab sample from each stockpile rather than compositing several samples from each stockpile. It would seem that composite sampling would provide a representative characterization of the entire soil pile.

ENTACT Response: The receiving landfill has approved of the 300 cubic yard sampling frequency requirement specified in the CMI Workplan. We agree that composite sampling of the staged material may sometimes be more representative of all of the material in the stockpile, but a grab sampling strategy is required for determination of LDR compliance pursuant to 40 CFR §268.48(a) and §268.49(c).

To be consistent with what is being implemented at the F-pond area, i.e., in-situ treatment, ENTACT is requesting a modification to the CMI Workplan to allow in-situ treatment of the impacted soils at the North

Ditch Staging Area, in lieu of using a CAMU. With this modification, the need to sample for LDR compliance becomes a moot issue because ENTACT will not generate a hazardous waste or soils containing a hazardous waste. ENTACT will modify the CMI Workplan to reflect this, if approved by U.S. EPA.

U.S. EPA Comment No. 8: Section 3.3.6, Restoration (North Ditch Staging Area). Explain why the North Ditch Staging Area will be covered with compacted road base material rather than being revegetated, this section of the CMI WP should specify Keystone's plans for future use of this area as a parking lot (as indicated in Section 3.3 of the Stormwater Pollution Prevention Plan).

ENTACT Response: Currently, the North Ditch Staging Area is being used for a parking lot and storage area. Upon completion of the remediation activities for this area, the area will be restored to its current condition and use, i.e., a parking lot and/or equipment storage area.

U.S. EPA Comment No. 9: Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area). The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging Area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to be installed at the north end of the pond and another new well to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

ENTACT Response: Based on the selected remedy, the F-Pond and North Ditch Staging Area will be clean closed to an industrial standard, and typically would not require additional groundwater monitoring. Keystone and ENTACT would like additional clarification on the purpose and objective of the groundwater monitoring requested by U.S. EPA so that an appropriate monitoring program can be properly designed for these units.

U.S. EPA Comment No. 10: This section should be expanded to note that quarterly progress reports will also identify problems encountered and resolutions implemented as part of CMI activity over the subject quarter. Also revise appropriate sections of the QAPP to reflect this clarification.

ENTACT Response: The progress reports submitted to U.S. EPA on a quarterly basis will include any problems encountered and resolutions implemented as part of the CMI activities over the subject quarter. ENTACT will modify the CMI Workplan, including the QAPP, to reflect our response to U.S. EPA's comment.

U.S. EPA Comment No. 11: SWPPP Appendix A Section 2.2, Sequence of Major Activities. Although Section 5.0 of the CMI WP indicated that corrective action work would be conducted between December 2005 and March 2006, this section of the SWPPP indicates a schedule running from November 2005 through February 2006. These inconsistencies between project documentation should be resolved. Given the current project status, it may be most appropriate to change both documents to reference a schedule from January to April 2006.

ENTACT Response: The project schedule will be revised to reflect a start date of January 2006 and a completion date of April 2006.

U.S. EPA Comment No. 12: SWPPP Appendix A. This section should be revised to note that Adams Street is on the west side of the facility and the Illinois River is on the southeast side, as shown in Figure 1.

ENTACT Response: Section 2.3 will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 13: SWPPP Appendix A Section 3.2, Structural Practices. According to this section of the SWPPP, earthen or hay bale berms may be installed on the downgradient edge of excavation/work areas to reduce stormwater velocities and prevent sediment/soil from being transported out of the unit. However, Section 3.1.8 of the CMI WP indicated that these berms would be constructed upgradient of the units to prevent stormwater run-on from entering the work areas. Although both approaches have their strengths and drawbacks, the two project documents should outline the same plan for stormwater control. Revise the document accordingly.

ENTACT Response: The applicable sections of the SWPPP and the CMI Workplan will be revised for consistency between the cited documents.

U.S. EPA Comment No. 14: SWPPP Appendix A. According to this section, sediments accumulating behind the silt fencing at Keystone will be collected and either consolidated with excavated soils for off-site disposal, or returned to on-site source areas if clean. The SWPPP should be expanded to clarify how Keystone will distinguish between impacted and clean sediment accumulations. Because silt fencing is proposed for placement downgradient of work areas, it is possible that all collected sediments may have originated in or passed through contaminated areas.

ENTACT Response: Accumulated sediments/soils collected from behind the silt fencing, prior to achieving acceptable post-excavation confirmation sampling results, will be consolidated with the excavated soils and treated, if necessary, for off-site disposal. Accumulated sediments/soils collected from behind the silt fencing, after post-excavation confirmation sampling results have been determined to be acceptable based on the remediation goals, will be placed back within the excavated area. ENTACT will modify the CMI Workplan to reflect our response to your comment.

U.S. EPA Comment No. 15: SWPPP Appendix A Section 3.5.1, Off-Site Vehicle Tracking. For clarity, the "existing stabilized construction entrance/exit" reference in the second paragraph of this section should be shown on Figure 2 of the CMI WP.

ENTACT Response: For clarity purposes the "existing stabilized construction/exit" will be added to Figures 1 and 2 of the SWPPP, in lieu of Figure 2 of the CMI Workplan.

U.S. EPA Comment No. 16: SWPPP Appendix A Section 4.0, Maintenance and Inspections. The last sentence in this section appears to include an incorrect reference to Section 3.4. Documentation requirements for corrective measures are discussed in Section 5.0. Verify the correct reference and revise the text accordingly.

ENTACT Response: We agree. The section referenced in Section 4.0 will be changed to Section 5.0 in the revised CMI Workplan.

U.S. EPA Comment No. 17: SWPPP Appendix A Section 5.5, Certifications. This section indicates that all project contractors and subcontractors have agreed to maintain the provisions of this SWPPP. Rather than signed certifications, however, Attachment A-3 contains only blank certification forms. The final version of the SWPPP should include actual contractor and subcontractor signatures.

ENTACT Response: The signed version of the SWPPP is maintained at the project site. A reference which states this fact will be added to this section of the revised CMI Workplan.

U.S. EPA Comment No. 18: FSP Appendix B Section 2.2, Sample Identification System and Sample Frequency. The sample identification system should be expanded to also include F-Pond post-treatment verification samples that will be used to ensure that the soil and sediment does not exceed TCLP criteria and will not be considered hazardous when generated.

ENTACT Response: Post-treatment characterization samples will be collected from the in-situ treated material of the F-Pond to determine if the material will exhibit a hazardous toxicity characteristic, when generated. If the material still exhibits a hazardous toxicity characteristic after the initial treatment, if generated, in-situ treatment will continue until the results of post-treatment characterization sampling indicate that the material will not exhibit a hazardous toxicity characteristic, when generated. Post-treatment verification samples will only be collected from ex-situ treated stockpiles to confirm that the material no longer exhibits the toxicity characteristic for lead and is in compliance with the LDR requirements at 40 CFR §268.49(c).

Post-treatment verification sampling activities related to the North Ditch Staging Area will be removed the CMI Workplan if in-situ treatment is allowed vs. treatment in a CAMU (see ENTACT's Response to U.S. EPA Comment No. 7).

U.S. EPA Comment No. 19: FSP Appendix B. According to the fourth step in the x-ray fluorescence (XRF) field screening process, a grab sample of sediment/soil may be collected and dried in a microwave prior to measurement if the soil moisture content is not optimal for screening. This section of the FSP should be expanded to document how Keystone will determine if drying is necessary (e.g., testing to indicate percent moisture and the specific test method to be used). In addition, the FSP should outline the procedure for temporary sample storage prior to and during the drying process, any pertinent chain of custody requirements, the microwave location (preferably on-site), the sample drying time duration or criteria and test methods upon which this determination will be based (e.g., less than 25% moisture), and the schedule for drying, screening, and recording results for these grab samples (e.g., on an individual sample basis or in a batch at the end of the day).

ENTACT Response: Per manufacturer instructions and U.S. EPA Method 6200 (Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment), a sample should be dried if the sample is saturated with water. In the field, saturation is typically determined by visual observation. Because the XRF screening unit is being used for field screening purposes only and not as a substitute for confirmation sampling and laboratory analysis, specific procedures regarding drying, sample storage and custody control are not warranted. In addition, the person responsible for XRF field screening typically performs all functions related to XRF field screening, including sample collection, transport/storage, drying, screening, and disposal. For the purposes of these corrective measures, XRF field screening will direct the excavation activities and determine if the collection of post-excavation confirmation samples, i.e. laboratory analysis, is warranted.

U.S. EPA Comment No. 20: FSP Appendix B Section 3.5, Post-Treatment Verification Samples. Sampling procedures similar to those outlined in this section should also be used to verify that in-situ treatment at the F-Pond has successfully rendered impacted soil/sediment non-hazardous. A post-treatment verification sampling program should also be outlined to confirm that all free liquids have been stabilized prior to transport.

ENTACT Response: With respect to post-treatment characterization sampling, refer to ENTACT's response to U.S. EPA Comment No. 18. The only area where "free liquids" may be an issue is in the F-Pond Area.

ENTACT proposes to run EPA Method 9095B, the Paint Filter Liquids Test, to determine compliance with 40 CFR §265.314. The test will be run at a frequency of one run per 10,000 cubic yards or a minimum of one run per day. The FSP will be modified to reflect ENTACT's response to U.S. EPA's comment.

U.S. EPA Comment No. 21: FSP Appendix B Section 4.1, Analytical Methods. The preparation method listed in this table for measuring total lead, iron, and manganese concentrations in water should be revised to reflect the most current approved version of the method (i.e., SW3010A rather than SW3010B), as listed in EPA's SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm.

ENTACT Response: The cited methods will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 22: FSP Appendix B. In addition to noting any deviations from the approved FSP, the field log books should document why the deviation was necessary and any expected impacts on the results of the CMI or laboratory analyses.

ENTACT Response: Section 6 of the Field Sampling Plan will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 23: QAPP (Appendix C) Section A.6.1.4, Treated Sediment/Soil Stockpiles. Refer to Comment above with regard to sampling of in-situ treated soil at the F-Pond rather than from soil stockpiles to verify that the media has been rendered non-hazardous prior to excavation. Revised this section of the QAPP as needed. Section B.1.4 of the QAPP should also be similarly revised.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment Nos. 7 and 18.

U.S. EPA Comment No. 24: QAPP (Appendix C) Section A.6.1.6, Groundwater. Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment No. 9.

U.S. EPA Comment No. 25: QAPP (Appendix C) Section A.9.4.1, Weekly and Quarterly Reports. Refer to Comment 10 above.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment No. 10.

U.S. EPA Comment No. 26: QAPP (Appendix C) Section B.5.1.2, Field Equipment. Inadequate quality control requirements are specified for the XRF analyses. Expand the documentation to note that calibration checks and target element response checks should be conducted twice daily, prior to and upon completion of analysis of field samples. In addition, target analytes, target concentrations, and acceptability criteria should be specified for each of the above-referenced quality control (QC) checks.

ENTACT Response: The section will be revised as commented by U.S. EPA. In addition, a reference will be included that states that the target analytes, target concentration and acceptability criteria for the readings are provided in the Niton XRF User Manual.

U.S. EPA Comment No. 27: QAPP (Appendix C). The laboratory data validation requirements should be expanded to require that at least 10 percent of the confirmation sample data from each of the sites be validated by a party independent of the laboratory in accordance with the National Functional Guidelines for Organic/Inorganic Data Review to ensure adequacy of the data to verify attainment of remedial action objectives.

ENTACT Response: With respect to data validation requirements, ENTACT reviews all of the data to ensure the adequacy of the data in verifying attainment of the remediation goals. This statement will be added to the cited section.

U.S. EPA Comment No. 28: QAPP (Appendix C). The test methods listed in this table for use during the CMI field effort should be updated to reflect the most current version of SW-846 preparation and analysis methods (e.g., SW3050B, SW3550B, SW3010A, SW8260B). For assistance in identifying current methods, please refer to EPA's SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm. If an older or alternate method has been specifically selected for this investigation, the text should provide clear justification for that decision.

ENTACT Response: The QAPP and relevant test methods will be updated in Tables 1 and 2 of the QAPP, as appropriate.

U.S. EPA Comment No. 29: QAPP (Appendix C) Table 2, List of Laboratory Data Quality Assurance Objectives. This table should be expanded to specify the required Illinois Environmental Protection Agency (IEPA) practical quantification limits (PQLs) that are referenced as the target reporting limits for the project and ensure that they are less than the cleanup objectives and other comparison criteria that will be used for the project. The table should also specify accuracy criteria for each of the volatile organic compound (VOC) and semivolatile organic compound (SVOC) constituents of concern (COCs) for the project.

ENTACT Response: Per 35 IAC §740.415(d)(3), the PQLs used by the laboratory for the requested soil analyses are less than or equal to the most protective Tier I soil remediation objectives in 35 Ill. Adm. Code 742 Appendix B or the remediation objective concentrations for the site. In most cases, however, the PQL will equal the lowest concentration that reliably can be achieved within the laboratory's specified limits of precision and accuracy during routine laboratory operating conditions, but is not greater than ten times the method detection limit. Because the PQL varies per analytical run, this information was not provided in the CMI Workplan. Instead, the laboratory was requested to comply with IEPA's requirements, as stated above. References will be added to Table 2 of the QAPP which reflect this.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

January 4, 2006

DE-9J

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Russ R. Perry Manager, Energy & Environmental Engineering Keystone Steel & Wire Company 7000 S.W. Adams Street Peoria, Illinois 61641-0002

> Re: Corrective Measures Implementation Workplan Keystone Steel & Wire Company EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed review of the November 2005 revised Corrective Measures Implementation (CMI) workplan. Although the corrective measures process outlined in the CMI WP generally appears technically sound and consistent with the approaches proposed in the April 2005 revised CMP, several significant issues of concern have been identified. These issues are outlined in the comments below. Comments specific to the Stormwater Pollution Prevention Plann (SWPPP), the Field Sampling Plan (FSP) and OAPP are also provided in the sections below. Additionally, in the October 19, 2005, selection of the final remedial alternative, KS&W was required to demonstrate that adequate funds will be available to complete the construction as well as the operation and maintenance of the selected remedy. KS&W was required to provide this financial assurance within 90 days after U.S. EPA selects the final remedy. This financial assurance demonstration is due on January 19, 2006. KS&W must revise the CMI workplan to address all of the comments in this attachment within 30 days of receipt of this letter and submit to U.S. EPA for review and approval.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely.

Jonathan Adenuga

Waste Pesticides and Toxics Division

Enclosure

ATTACHMENT

1) Action levels should be specified in the CMI WP for each of the sample types to be collected. Comparison criteria for surface water and groundwater data should be identified.

Section 3.2.4, Identification of Characteristically Hazardous Sediment/Soil (F-Pond)

2) According to this section, a four-part composite sample will be collected from each F-Pond grid to identify soil and sediment exhibiting the toxicity characteristic for lead. The four composite sample parts will be collected from the four corners of each grid, specifically within 5 to 10 feet of each corner. Based on the 50 by 50 foot grid spacing specified in Section 3.1.9, this proposed sample distribution clusters sampling close together at the corners of neighboring grids, while leaving a relatively large area in the center of the grid unrepresented. Unless additional justification is provided regarding the potential effectiveness of this sampling plan, a five-part composite sampling program (including one sample portion from the grid center) should be implemented.

Alternatively, the sampling plan can be revised to more evenly distribute composite sampling locations (e.g., along the grid diagonals approximately 15 to 20 feet from the sample corners). In addition, the composite sampling depth should be specified in this section. Revise all project documentation accordingly. In particular, figures in the FSP should be modified to show the specified grid size, rather than a 25 by 25 foot grid.

Section 3.2.5, In-Situ Treatment and Stabilization (F-Pond)

- 3) As outlined in the April 2005 CMP, corrective measures planned for the F-Pond include in-situ treatment of characteristically hazardous soils and sediment to render them nonhazardous, followed by excavation to achieve remediation goals for total lead and iron. Section 3.2.5 of this CMI WP also calls for in-situ treatment of characteristically hazardous soils and sediment at the F-Pond, followed immediately by excavation and stockpiling on site within the footprint of the F-Pond. Rather than sample the treated soil and sediment in place to confirm that the media no longer exhibit the toxicity characteristic for lead, Keystone proposes to collect samples from the various stockpiles for hazardous waste characterization purposes. This proposal is unacceptable. All post-treatment characterization sampling of F-Pond soil and sediment should be conducted while the soil and sediment remains in place. Excavation should not occur until sampling results confirm that the treated soil and sediment will not be considered hazardous when disturbed (even if remaining within the F-Pond footprint).
- 4) Section 6.1.1 of the April 2005 CMP indicates that a treatability study will be performed to determine the appropriate additive and dosage for rendering F-Pond soils and sediments nonhazardous when generated. Section 3.2.5 of the CMI WP indicates that the contractor will rely on previous experience with the treatment of soil and sediment at sites with similar characteristics in lieu of a formal treatability study. This proposal is acceptable, as long as Keystone ensures that treatment objectives for the F-Pond are

ultimately met. In addition, additional detail should be provided in this section of the CMI WP to document the expected dosage of triple superphosphate (TSP) for soil/sediment at the F-Pond, or specific field methods the contractor will use to determine that sufficient TSP has been added to render the soils nonhazardous and ready for TCLP sampling. The TSP dosage ratio should also be provided in Section 3.3.5 for treatment at the North Ditch Staging Area.

5) The second paragraph of this section indicates that wet impacted soil and sediment with total lead and/or iron concentrations above applicable remediation goals will be solidified to remove free liquids prior to transportation for off-site disposal. Unless the soil will be solidified prior to excavation, the CMI WP should be expanded to clarify how free liquids in the stockpiled soil/sediment will be controlled such that additional areas within the F-Pond footprint are not negatively impacted.

Section 3.2.8, Restoration (F-Pond)

6) This section of the document seems to indicate that the only Nationwide Permit 38 restoration requirement applicable to the F-Pond corrective measures proposal involves grading for drainage. Keystone should confirm that this interpretation is correct and specifically clarify that such grading is the only mandatory restoration activity.

Section 3.3.5, Treatment (North Ditch Staging Area)

7) According to this section, one post-treatment verification grab sample will be collected from each treated soil stockpile at the North Ditch Staging Area (i.e., one sample for TCLP analysis for each 300 cubic yards of treated soil). Keystone should verify that the receiving Subtitle D landfill facility will accept this sampling ratio for hazardous waste characterization or will require more frequent characterization sampling and analysis. In addition, Keystone should provide justification for collecting only a single grab sample from each stockpile rather than compositing several samples from each stockpile. It would seem that composite sampling would provide a representative characterization of the entire soil pile.

Section 3.3.6, Restoration (North Ditch Staging Area)

8) Explain why the North Ditch Staging Area will be covered with compacted road base material rather than being revegetated, this section of the CMI WP should specify Keystone's plans for future use of this area as a parking lot (as indicated in Section 3.3 of the Stormwater Pollution Prevention Plan).

Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area)

9) The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to

be installed at the north end of the pond and another new well to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

10) This section should be expanded to note that quarterly progress reports will also identify problems encountered and resolutions implemented as part of CMI activity over the subject quarter. Also revise appropriate sections of the QAPP to reflect this clarification.

SPECIFIC COMMENTS ON THE SWPPP (Appendix A)

Section 2.2, Sequence of Major Activities

- 11) Although Section 5.0 of the CMI WP indicated that corrective action work would be conducted between December 2005 and March 2006, this section of the SWPPP indicates a schedule running from November 2005 through February 2006. These inconsistencies between project documentation should be resolved. Given the current project status, it may be most appropriate to change both documents to reference a schedule from January to April 2006.
- 12) This section should be revised to note that Adams Street is on the west side of the facility and the Illinois River is on the southeast side, as shown in Figure 1.

Section 3.2, Structural Practices

- 13) According to this section of the SWPPP, earthen or hay bale berms may be installed on the downgradient edge of excavation/work areas to reduce stormwater velocities and prevent sediment/soil from being transported out of the unit. However, Section 3.1.8 of the CMI WP indicated that these berms would be constructed upgradient of the units to prevent stormwater run-on from entering the work areas. Although both approaches have their strengths and drawbacks, the two project documents should outline the same plan for stormwater control. Revise the document accordingly.
- 14) According to this section, sediments accumulating behind the silt fencing at Keystone will be collected and either consolidated with excavated soils for off-site disposal, or returned to on-site source areas if clean. The SWPPP should be expanded to clarify how Keystone will distinguish between impacted and clean sediment accumulations. Because silt fencing is proposed for placement downgradient of work areas, it is possible that all collected sediments may have originated in or passed through contaminated areas.

Section 3.5.1, Off-Site Vehicle Tracking

15) For clarity, the ôexisting stabilized construction entrance/exitö reference in the second paragraph of this section should be shown on Figure 2 of the CMI WP.

Section 4.0, Maintenance and Inspections

16) The last sentence in this section appears to include an incorrect reference to Section 3.4. Documentation requirements for corrective measures are discussed in Section 5.0. Verify the correct reference and revise the text accordingly.

Section 5.5, Certifications

17) This section indicates that all project contractors and subcontractors have agreed to maintain the provisions of this SWPPP. Rather than signed certifications, however, Attachment A-3 contains only blank certification forms. The final version of the SWPPP should include actual contractor and subcontractor signatures.

SPECIFIC COMMENTS ON THE FSP (Appendix B)

Section 2.2, Sample Identification System and Sample Frequency

- 18) The sample identification system should be expanded to also include F-Pond posttreatment verification samples that will be used to ensure that the soil and sediment does not exceed TCLP criteria and will not be considered hazardous when generated.
- 19) According to the fourth step in the x-ray fluorescence (XRF) field screening process, a grab sample of sediment/soil may be collected and dried in a microwave prior to measurement if the soil moisture content is not optimal for screening. This section of the FSP should be expanded to document how Keystone will determine if drying is necessary (e.g., testing to indicate percent moisture and the specific test method to be used). In addition, the FSP should outline the procedure for temporary sample storage prior to and during the drying process, any pertinent chain of custody requirements, the microwave location (preferably on-site), the sample drying time duration or criteria and test methods upon which this determination will be based (e.g., less than 25% moisture), and the schedule for drying, screening, and recording results for these grab samples (e.g., on an individual sample basis or in a batch at the end of the day).

Section 3.5, Post-Treatment Verification Samples

20) Sampling procedures similar to those outlined in this section should also be used to verify that in-situ treatment at the F-Pond has successfully rendered impacted soil/sediment nonhazardous. A post-treatment verification sampling program should also be outlined to confirm that all free liquids have been stabilized prior to transport.

Section 4.1, Analytical Methods

- 21) The preparation method listed in this table for measuring total lead, iron, and manganese concentrations in water should be revised to reflect the most current approved version of the method (i.e., SW3010A rather than SW3010B), as listed in EPAÆs SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm.
- 22) In addition to noting any deviations from the approved FSP, the field log books should document why the deviation was necessary and any expected impacts on the results of the CMI or laboratory analyses.

SPECIFIC COMMENTS ON THE QAPP (Appendix C)

Section A.6.1.4, Treated Sediment/Soil Stockpiles

23) Refer to Comment above with regard to sampling of in-situ treated soil at the F-Pond rather than from soil stockpiles to verify that the media has been rendered nonhazardous prior to excavation. Revised this section of the QAPP as needed. Section B.1.4 of the QAPP should also be similarly revised.

Section A.6.1.6, Groundwater

24) Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

Section A.9.4.1, Weekly and Quarterly Reports

25) Refer to Comment 10 above.

Section B.5.1.2, Field Equipment

- 26) Inadequate quality control requirements are specified for the XRF analyses. Expand the documentation to note that calibration checks and target element response checks should be conducted twice daily, prior to and upon completion of analysis of field samples. In addition, target analytes, target concentrations, and acceptability criteria should be specified for each of the above-referenced quality control (QC) checks.
- 27) The laboratory data validation requirements should be expanded to require that at least 10 percent of the confirmation sample data from each of the sites be validated by a party independent of the laboratory in accordance with the National Functional Guidelines for Organic/Inorganic Data Review to ensure adequacy of the data to verify attainment of remedial action objectives.
- 28) The test methods listed in this table for use during the CMI field effort should be updated to reflect the most current version of SW-846 preparation and analysis methods (e.g.,

SW3050B, SW3550B, SW3010A, SW8260B). For assistance in identifying current methods, please refer to EPAÆs SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm. If an older or alternate method has been specifically selected for this investigation, the text should provide clear justification for that decision.

Table 2, List of Laboratory Data Quality Assurance Objectives

29) This table should be expanded to specify the required Illinois Environmental Protection Agency (IEPA) practical quantitation limits (PQLs) that are referenced as the target reporting limits for the project and ensure that they are less than the cleanup objectives and other comparison criteria that will be used for the project. The table should also specify accuracy criteria for each of the volatile organic compound (VOC) and semivolatile organic compound (SVOC) constituents of concern (COCs) for the project.